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**ATTACHMENTS TO THE FINAL**

**DANGEROUS WASTE PORTION  
OF THE  
RESOURCE CONSERVATION  
AND RECOVERY ACT  
FOR THE TREATMENT,  
STORAGE AND DISPOSAL OF  
DANGEROUS WASTE**

**AUGUST 29, 1994**

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ATTACHMENT 1 TO THE  
DANGEROUS WASTE PORTION OF  
THE RESOURCE CONSERVATION  
AND RECOVERY ACT FOR THE  
TREATMENT, STORAGE AND  
DISPOSAL OF DANGEROUS WASTE

# **Hanford Federal Facility Agreement and Consent Order**

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**Fourth Amendment, January 1994**  
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**by**

**Washington State  
Department of Ecology**

**United States  
Environmental Protection Agency**

**United States  
Department of Energy**

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**Hanford Federal Facility  
Agreement and Consent Order**

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by

Washington State  
Department of Ecology

United States  
Environmental Protection Agency

United States  
Department of Energy

**May 1989**

**As Amended, September 1990**

**September 1991**

**August 1992**

**January 1994**

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## CONTENTS

SUMMARY	1
PART ONE. INTRODUCTION	3
Article I. Jurisdiction	3
Article II. Parties	6
Article III. Purpose	7
Article IV. Statutory Compliance and RCRA/CERCLA Integration and Coordination	9
Article V. Definitions	12
PART TWO. PERMITTING/CLOSURE OF TSD UNITS/GROUPS	16
Article VI. Findings and Determinations	16
Article VII. Work	18
Article VIII. Resolution of Disputes	20
Article IX. Stipulated Dangerous Waste Penalties	24
Article X. Enforceability	26
Article XI. Schedule	27
Article XII. Common Terms	27
PART THREE. REMEDIAL AND CORRECTIVE ACTIONS	28
Article XIII. Findings and Determinations	28
Article XIV. Work	31
Article XV. Review of Documents	35
Article XVI. Resolution of Disputes	36
Article XVII. Schedule	41
Article XVIII. Permits	41
Article XIX. Recovery of EPA CERCLA Response Costs	44
Article XX. Stipulated Penalties	44
Article XXI. Enforceability	47
Article XXII. Common Terms	48
PART FOUR. INTEGRATION OF EPA AND ECOLOGY RESPONSIBILITIES	49
Article XXIII. RCRA/CERCLA Interface	49
Article XXIV. Lead Regulatory Agency and Regulatory Approach Decisions	50
Article XXV. Physically Inconsistent Actions	50
Article XXVI. Dispute Resolution	51
Article XXVII. Other Disputes and EPA Oversight	53
Article XXVIII. RCRA/CERCLA Reservation of Rights	53

## CONTENTS (continued)

PART FIVE. COMMON PROVISIONS . . . . .	55
Article XXIX. Recovery of State Costs . . . . .	55
Article XXX. Additional Work or Modification to Work . . . . .	60
Article XXXI. Quality Assurance . . . . .	61
Article XXXII. Creation of Danger . . . . .	62
Article XXXIII. Notification . . . . .	62
Article XXXIV. Project Managers . . . . .	63
Article XXXv. Sampling and Data/Document Availability . . . . .	63
Article XXXVI. Retention of Records . . . . .	63
Article XXXVII. Access . . . . .	64
Article XXXVIII. Five-Year Review . . . . .	66
Article XXXIX. Amendment of Agreement . . . . .	66
Article XL. Extensions . . . . .	66
Article XLI. Conveyance of Title . . . . .	69
Article XLII. Public Participation . . . . .	69
Article XLIII. Duration/Termination . . . . .	70
Article XLIV. Severability . . . . .	71
Article XLV. Classified and Confidential Information . . . . .	71
Article XLVI. Reservation of Rights . . . . .	72
Article XLVII. Force Majeure . . . . .	75
Article XLVIII. Cost, Schedule, and Scope Planning and Reporting . . . . .	76
Article XLIX. Compliance with Applicable Laws . . . . .	83
Article L. Effective Date . . . . .	84
Article LI. Attachment 1 Description . . . . .	84

ATTACHMENT 1 Letter from U.S. Department of Justice

ATTACHMENT 2 Action Plan

## CONTENTS (continued)

EXECUTIVE SUMMARY	1
1.0 INTRODUCTION	1-1
1.1 Purpose	1-1
1.2 Regulatory Authorities	1-1
1.3 Organization of Action Plan	1-3
2.0 MILESTONES	2-1
2.1 Introduction	2-1
2.2 Disposal of Tank Wastes	2-1
2.3 Cleanup of Past-Practice Units	2-1
2.4 RCRA and HWMA Operating Requirements	2-2
3.0 UNIT IDENTIFICATION, CLASSIFICATION, AND PRIORITIZATION	3-1
3.1 Introduction	3-1
3.2 Treatment, Storage, and Disposal Units	3-2
3.3 Past-Practice Units	3-2
3.4 Prioritization	3-3
3.5 Waste Information Data System and Hanford Site Waste Management Units Report	3-5
4.0 PROJECT AND UNIT MANAGERS	4-1
4.1 Project Managers	4-1
4.2 Unit Manager Role	4-1
5.0 INTERFACE OF REGULATORY AUTHORITIES	5-1
5.1 Regulatory Programs	5-1
5.2 Categories of Waste Units	5-1
5.3 Management of Treatment, Storage, and Disposal Units	5-2
5.4 Management of Past Practice Units	5-3
5.5 Treatment, Storage, and Disposal Units and Past-Practice Units Interface	5-4
5.6 Lead Regulatory Agency Concept	5-4
5.7 Integration with the National Environmental Policy Act	5-6
6.0 TREATMENT, STORAGE, AND DISPOSAL UNIT PROCESS	6-1
6.1 Introduction	6-1
6.2 Treatment, Storage, and Disposal Permitting Process	6-2
6.3 Treatment, Storage, and Disposal Closure Process	6-4
6.4 Response to Imminent and Substantial Endangerment Cases	6-7
6.5 Quality Assurance	6-7
7.0 PAST PRACTICES PROCESSES	7-1
7.1 Introduction	7-1
7.2 Preliminary Processes	7-1
7.3 Comprehensive Environmental Response, Compensation and Liability Act Past-Practice Unit Process	7-6
7.4 Resource Conservation and Recovery Act Past-Practice Unit Process	7-15

## CONTENTS (continued)

7.5	Cleanup Requirements . . . . .	7-18
7.6	Natural Resource Trusteeships . . . . .	7-21
7.7	Health Assessments . . . . .	7-22
7.8	Quality Assurance . . . . .	7-23
8.0	MEETINGS AND REPORTS . . . . .	8-1
8.1	Project Managers Meeting . . . . .	8-1
8.2	Unit Managers Meeting . . . . .	8-1
9.0	DOCUMENTATION AND RECORDS . . . . .	9-1
9.1	Categorization of Documents . . . . .	9-1
9.2	Document Review and Comment Process . . . . .	9-1
9.3	Document Revisions . . . . .	9-7
9.4	Administrative Record . . . . .	9-9
9.5	Distribution of Documents and Correspondence . . . . .	9-14
9.6	Data Access and Delivery Requirements . . . . .	9-15
10.0	COMMUNITY RELATIONS/PUBLIC INVOLVEMENT . . . . .	10-1
10.1	Introduction . . . . .	10-1
10.2	Public Information Repositories . . . . .	10-1
10.3	Mailing Lists and Newsletter . . . . .	10-2
10.4	Press Releases . . . . .	10-2
10.5	Public Meetings . . . . .	10-2
10.6	Public Comment Opportunities . . . . .	10-3
10.7	Public Hearing Opportunities . . . . .	10-5
10.8	Technical Assistance Grants . . . . .	10-5
10.9	Washington State Public Participation Grants . . . . .	10-5
10.10	Indian Tribes . . . . .	10-6
10.11	Citizen Suit Provisions . . . . .	10-7
11.0	WORK SCHEDULE AND OTHER WORK PLANS . . . . .	11-1
11.1	Introduction . . . . .	11-1
11.2	Work Schedule Format and Preparation . . . . .	11-1
11.3	Annual Updates and Other Revisions . . . . .	11-2
11.4	Work Plans and Supporting Schedules . . . . .	11-2
11.5	Other Work Plans . . . . .	11-3
11.6	Supporting Technical Plans and Procedures . . . . .	11-3
11.7	Tank Waste Remediation System Critical Path Process . . . . .	11-3
12.0	CHANGES TO ACTION PLAN/SUPPORTING SCHEDULES . . . . .	12-1
12.1	Introduction . . . . .	12-1
12.2	Authority to Approve Changes . . . . .	12-1
12.3	Formal Change Control Process . . . . .	12-2
12.4	Minor Field Changes . . . . .	12-2
12.5	Revision of Action Plan . . . . .	12-4
13.0	LIQUID EFFLUENT TREATMENT AND DISPOSAL . . . . .	13-1
13.1	Liquid Effluent Discharge Restrictions . . . . .	13-1
14.0	SIGNATURE . . . . .	14-1

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## CONTENTS (continued)

### APPENDIXES

A.	Definition of Terms and Acronyms . . . . .	A-1
B.	Listing of Treatment, Storage, and Disposal Groups/Units . . . . .	B-1
C.	Prioritized Listing of Operable Units . . . . .	C-1
D.	Work Schedule . . . . .	D-1
E.	Key Individuals . . . . .	E-1
F.	Supporting Technical Plans and Procedures . . . . .	F-1
G.	Data Management Initiatives . . . . .	G-1

## LIST OF FIGURES

6-1	Permitting Process Flowchart . . . . .	6-3
6-2	Closure Process Flowchart . . . . .	6-6
7-1	Aggregate Areas . . . . .	7-2
7-2	Comparison of Resource Conservation and Recovery Act Corrective Action and Comprehensive Environmental Response, Compensation, and Liability Act Remedial Processes . . . . .	7-3
7-3	Overview of the Remedial Investigation/Feasibility Study Process . . . . .	7-8
7-4	Remedial Investigation/Feasibility Studies (Resource Conservation and Recovery Act Facility Investigation/Corrective Measures Study) Work Plan Review and Approval . . . . .	7-10
7-5	Overview of the RCRA Facility Investigation/Corrective Measures Study Process . . . . .	7-16
9-1	Review and Comment on Primary Documents . . . . .	9-4
9-2	Part B Permit Application and Closure/Postclosure Plan Process Flowchart . . . . .	9-6
9-3	Review and Comment on Secondary Documents . . . . .	9-8
12-1	Change Control Sheet . . . . .	12-3



## LIST OF TABLES

9-1	Primary Documents . . . . .	9-2
9-2	Secondary Documents . . . . .	9-3
9-3	Administrative Record Documents . . . . .	9-11
D	Major and Interim Milestones . . . . .	D-2

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
AND THE  
STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

IN THE MATTER OF:

The U.S. Department of Energy,  
Richland Operations Office,  
Richland, Washington

HANFORD FEDERAL FACILITY  
AGREEMENT AND CONSENT ORDER

Respondent                      EPA Docket Number: 1089-03-04-120  
Ecology Docket Number: 89-54

Based on the information available to the Parties on the effective date of this HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER ("Agreement"), and without trial or adjudication of any issues of fact or law, the Parties agree as follows:

This Agreement is divided into five parts: Part One contains introductory provisions which apply to Parts Two, Three, Four, and Five: Part Two contains provisions governing hazardous waste treatment, storage and disposal (TSD), hazardous waste facility permitting, closure and post-closure activities; Part Three contains provisions governing remedial and corrective action activities; Part Four contains provisions which delineate in part the respective roles and interrelationships between EPA and Ecology, and between CERCLA and RCRA on the Hanford Site; and Part Five contains common provisions which apply to Parts Two, Three, and Four. CERCLA response actions and corrective actions under HSWA, before and after State authorization, shall be governed by Part Three of this Agreement. RCRA compliance, and TSD permitting, closure, and post closure care (except HSWA corrective action) shall be governed by Part Two of this Agreement.

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This Agreement also consists of Attachment 1, a letter dated February 26, 1989 from the Department of Justice to the Department of Ecology, Attachment 2, the Action Plan, and Attachment 3, the Mutual Cooperation Funding Agreement between the Department of Ecology and the Department of Energy. In the event of any inconsistency between this Agreement and the attachments to this Agreement, this Agreement shall govern unless and until duly modified pursuant to Article XXXIX (Amendment) of this Agreement.

The Action Plan contains plans, procedures and implementing schedules. The Action Plan is an integral and enforceable part of this Agreement.

Parts One, Two, Four, and Five of this Agreement are entered into by Ecology pursuant to Ecology's authority to issue regulatory orders pursuant to Chapter 70.105.095, Revised Code of Washington.

## PART ONE

### INTRODUCTION

#### ARTICLE I. JURISDICTION

1. The U.S. Environmental Protection Agency (EPA), Region 10, enters into this Agreement pursuant to Section 120(e) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. Section 9620(e), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), Pub. L. 99-499 (hereinafter jointly referred to as CERCLA), and Sections 6001, 3008(h), and 3004(u) and (v) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Sections 6961, 6928(h), 6924(u) and (v), as amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA), Pub. L. 98-616 (hereinafter jointly referred to as RCRA) and Executive Order 12580.

2. Pursuant to Section 3006 of the Resource Conservation and Recovery Act, 42 U.S.C. Section 6926, EPA may authorize states to administer and enforce a state hazardous waste management program, in lieu of the federal hazardous waste management program. The State of Washington has received authorization from EPA to administer and enforce such a program within the State of Washington. The requirements of the federally authorized state program are equivalent to the requirements of the federal program set forth in Subtitle C of RCRA and its implementing regulations (excluding those portions of the federal program imposed pursuant to HSWA). The Department of Ecology (Ecology) is the state agency designated by RCW 70.105.130 to implement and enforce the provisions of the Resource Conservation and Recovery Act as amended.

3. The State of Washington, Department of Ecology (Ecology) enters into this Agreement pursuant to CERCLA, RCRA, and Washington Hazardous Waste Management Act, Chapter 70.105 RCW.

4. The Parties agree that the generation, treatment, storage, and disposal of hazardous waste is regulated by the State of Washington, Department of Ecology pursuant to Ch. 70.105 RCW, the State Hazardous Waste Management Act (HWMA), and regulations governing the management of hazardous wastes are contained at Ch. 173-303 WAC, and finally that pursuant to Section 6001 of RCRA, 42 U.S.C. Sec. 6961, the United States Department of Energy (DOE), as a federal agency, must comply with the procedural and substantive requirements of such state law. DOE is a "person" as defined at RCW 70.105.010(7).

5. The U.S. Department of Energy (DOE) enters into this Agreement pursuant to Section 120(e) of CERCLA, Sections 6001, 3008(h), and 3004(u) and (v) of RCRA, Executive Orders 12580 (January 1987) and 12088 (Oct. 1978), and the Atomic Energy Act of 1954, as amended, 42 U.S.C. Section 2011 et seq. DOE agrees that it is bound by this Agreement and that its terms may be enforced against DOE pursuant to the terms of this Agreement or as otherwise provided by law. As stated in Section 1006 of RCRA, nothing in this Agreement shall be construed to require DOE to take any action pursuant to RCRA which is inconsistent with the requirements of the Atomic Energy Act of 1954, as amended. In the event DOE asserts that it cannot comply with any provision of this Agreement based on an alleged inconsistency between the requirements of this Agreement and the Atomic Energy Act of 1954, as amended, it shall provide the basis for the inconsistency assertion in writing. In the event Ecology

disagrees with the assertions by DOE, Ecology reserves the right to seek judicial review, or take any other action provided by law in case of any such alleged inconsistency.

6. The Parties are entering into this Agreement in anticipation that the Hanford Site will be placed on the National Priorities List (NPL), 40 CFR Part 300. The Hanford Site has been listed by EPA on the federal agency hazardous waste compliance docket under CERCLA Section 120, 52 Federal Register 4280 (Feb. 12, 1988). Four subareas of the Hanford Site have been proposed by EPA for addition to the NPL, 53 Fed. Reg. 23988 (June 24, 1988). [Note: The four areas of the Hanford Site were officially listed on the NPL on November 3, 1989 (Federal Register 41015, October 4, 1989)]. When the Hanford Site, or subareas of the Site, is placed on the NPL, Parts One, Three, Four, and Five of this Agreement shall also serve as the Interagency Agreement required by CERCLA Section 120(e). Parts One, Two, Four, and Five of this Agreement shall serve as the RCRA provisions governing compliance, permitting, closure and post-closure care of TSD Units. The Action Plan, at Appendix B, lists those treatment, storage or disposal (TSD) Groups or Units regulated by Ch. 70.105 RCW. As the categorization effort continues, TSD Units may be added to this list. DOE agrees that those TSD Units listed in Appendix B of the Action Plan, and any additional TSD Units which are identified as TSD Units in the future are subject to the regulatory framework of Ch. 70.105 RCW pursuant to RCRA Section 6001. Ecology's authority over these TSD Units shall not be abrogated or affected by the nomination or ultimate inclusion of the Hanford Site on the National Priorities List and such Units shall be regulated in accordance with this Agreement; provided, however, that with

respect to conflicts between EPA and Ecology regarding corrective action and remedial action, Article XXVIII (RCRA/CERCLA Reservation of Rights) shall be controlling.

7. On April 13, 1993, the District Court for the Eastern District of Washington issued an Order Granting in Part and Denying in Part Motions to Dismiss claims of the plaintiffs in Heart of America Northwest v. Westinghouse Hanford Company, No. CY-92-144-AAM. The court concluded in its opinion that this Agreement embodies an integrated response action under sections 120 and 104 of CERCLA, and that plaintiffs' claims consequently were barred by section 113(h) of CERCLA. Plaintiffs did not seek to enforce this Agreement, but instead sought to impose requirements that were not part of this Agreement. Nothing in the court's opinion affects the enforceability of this Agreement. All parties reaffirm that this Agreement is enforceable in accordance with all its terms, reservations and applicable law.

## ARTICLE II. PARTIES

8. The Parties to this Agreement are EPA, Ecology, and DOE.

9. DOE shall provide a copy of this Agreement and relevant attachments to each of its prime contractors. A copy of this Agreement shall be made available to all other contractors and subcontractors retained to perform work under this Agreement. DOE shall provide notice of this Agreement to any successor in interest prior to any transfer of ownership or operation.

10. DOE shall notify EPA and Ecology of the identity and the scope of work of each of its prime contractors and their subcontractors to be used in carrying out the terms of this Agreement in advance of their involvement in such work. Upon request, DOE shall also provide the identity and work scope of any other contractors and subcontractors performing work under this



Agreement. DOE shall take all necessary measures to assure that its contractors, subcontractors and consultants performing work under this Agreement act in a manner consistent with the terms of this Agreement.

11. DOE agrees to undertake all actions required by the terms and conditions of this Agreement and not to contest state or EPA jurisdiction to execute this Agreement and enforce its requirements as provided herein.

12. This Article II shall not be construed as a promise to indemnify any person.

13. DOE remains obligated by this Agreement regardless of whether it carries out the terms through agents, contractors, and/or consultants. Such agents, contractors, and/or consultants shall be required to comply with the terms of this Agreement, but the Agreement shall be binding and enforceable only against the Parties to this Agreement.

### ARTICLE III. PURPOSE

14. The general purposes of this Agreement are to:

A. Ensure that the environmental impacts associated with past and present activities at the Hanford Site are thoroughly investigated and appropriate response action taken as necessary to protect the public health, welfare and the environment;

B. Provide a framework for permitting TSD Units, promote an orderly, effective investigation and cleanup of contamination at the Hanford Site, and avoid litigation between the Parties;

C. Ensure compliance with RCRA and the Washington Hazardous Waste Management Act (HWMA), Ch. 70.105 RCW, for TSD Units including requirements covering permitting, compliance, closure, and post-closure care.

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D. Establish a procedural framework and schedule for developing, prioritizing, implementing and monitoring appropriate response actions at the Hanford Site in accordance with CERCLA, the National Contingency Plan (NCP), 40 CFR Part 300, Superfund guidance and policy, RCRA, and RCRA guidance and policy;

E. Facilitate cooperation, exchange of information and the coordinated participation of the Parties in such actions; and

F. Minimize the duplication of analysis and documentation.

15. Specifically, the purposes of this Agreement are to:

A. Identify TSD Units which require permits; establish schedules to achieve compliance with interim and final status requirements and to complete DOE's Part B permit application for such Units in accordance with the Action Plan; identify TSD Units which will undergo closure; close such Units in accordance with applicable laws and regulations; require post-closure care where necessary; and coordinate closure with any inter-connected remedial action at the Hanford Site.

B. Identify Interim Action (IA) alternatives which are appropriate at the Hanford Site prior to the implementation of final corrective and remedial actions under RCRA and CERCLA. IA alternatives shall be identified and proposed to the Parties as early as possible and prior to formal proposal, in accordance with the Action Plan. This process is designed to promote cooperation among the Parties in promptly identifying IA alternatives.

C. Establish requirements for the performance of investigations to determine the nature and extent of any threat to the public health or welfare or the environment caused by any release and threatened release of hazardous substances, pollutants or contaminants at Hanford and to establish requirements for the performance of studies for the Hanford Site to identify,

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evaluate, and select alternatives for the appropriate action(s) to prevent, mitigate, or abate the release or threatened release of hazardous substances, pollutants or contaminants at the Hanford Site in accordance with CERCLA and HSWA.

D. Identify the nature, objective and schedule of response actions to be taken at the Hanford Site. Response actions at Hanford shall attain that degree of cleanup of hazardous substances, pollutants or contaminants mandated by CERCLA (including applicable or relevant and appropriate state and federal requirements for remedial actions in accordance with Section 121 of CERCLA, 42 U.S.C. Sec. 9621), and HSWA.

E. Implement the selected interim and final remedial actions in accordance with CERCLA, and selected corrective actions in accordance with RCRA.

#### ARTICLE IV. STATUTORY COMPLIANCE AND RCRA/CERCLA INTEGRATION AND COORDINATION

16. Waste Management Units on the Hanford Site have been classified as either TSD units subject to Chapter 70.105 RCW or past practice units subject to either CERCLA or the corrective action provisions of RCRA. Operable units have been formed which group multiple units for action in accordance with the Action Plan. Some units may be subject to and addressed by both Chapter 70.105 RCW and CERCLA and/or the corrective action requirements of RCRA. Part Two of this Agreement sets forth DOE's obligation to obtain TSD permits, to close TSD Units, and otherwise comply with applicable RCRA requirements. Part Three of this Agreement sets forth DOE's obligations to satisfy CERCLA and HSWA corrective action.

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17. In this comprehensive Agreement, the Parties intend to integrate DOE's CERCLA response obligations and RCRA corrective action obligations which relate to the release(s) of hazardous substances, hazardous wastes, pollutants and contaminants covered by this Agreement. Therefore, the Parties intend that activities covered by Part Three of this Agreement will achieve compliance with CERCLA, 42 U.S.C. Section 9601 et seq.; will satisfy the corrective action requirements of Sections 3004(u) and (v) of RCRA, 42 U.S.C. Section 6924(u) and (v), for a RCRA permit, and Section 3008(h), 42 U.S.C. Section 6928(h); and will meet or exceed all applicable or relevant and appropriate federal and state requirements to the extent required by Section 121 of CERCLA, 42 U.S.C. Section 9621. The Parties agree that with respect to releases covered by this Agreement, RCRA, and RCW Chapters 70.105 and the Model Toxics Control Act (Initiative 97) as codified beginning March 1, 1989, shall be incorporated where appropriate as "applicable or relevant and appropriate requirements" pursuant to Section 121 of CERCLA.

18. The Parties agree that past practice authority may provide the most efficient means for addressing groundwater contamination plumes originating from both TSD and past practice units. However, in order to ensure that TSD units at Hanford are brought into compliance with RCRA and state hazardous waste regulations, Ecology intends, subject to Part Four of this Agreement, that remedial actions that address TSD groundwater contamination, excluding situations where there is an imminent threat to the public health or environment, will meet or exceed the substantive requirements of RCRA.

19. Based on the foregoing, the Parties intend that any remedial or corrective action selected, implemented and completed under Part Three of this Agreement shall be protective of human health and the environment such that

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remediation of releases covered by this Agreement shall obviate the need for further remedial or corrective action. The Parties intend that such actions will address all aspects of contamination at units covered by the Action Plan so that no further action will be required under federal and state law. However, the Parties recognize and agree that remediation of groundwater contamination from TSD units at the Hanford Site may be managed either under Part Three of this Agreement, or under Part Two of this Agreement, in accordance with the Action Plan. Ecology reserves the right to enforce timely cleanup of TSD associated groundwater contamination as provided in Article XLVI (Reservation of Rights).

20. Until Ecology is authorized pursuant to Section 3006 of RCRA, EPA will administer those provisions of Subtitle C of RCRA for which Ecology is not authorized. When Ecology receives authorization from EPA to implement the corrective action provisions of RCRA pursuant to Section 3006 of RCRA, Ecology shall administer and enforce such provisions in accordance with this Agreement. At such time, Ecology may enforce the RCRA corrective action requirements of the Agreement pursuant to Article X (Enforceability), and any disputes with DOE involving such corrective action requirements shall be resolved in accordance with Article VIII (Resolution of Disputes). Disputes arising under Part Two of this Agreement involving provisions of Subtitle C of RCRA for which the State is not authorized shall be resolved in accordance with Article XVI (Resolution of Disputes). EPA and Ecology agree that when permits are issued to DOE for hazardous waste management activities pursuant to Part Two of this Agreement, requirements relating to remedial action for hazardous waste management units under Part Three of this Agreement shall be the RCRA corrective action requirements for those units, whether that permit is administered by EPA or Ecology. EPA and Ecology shall reference and

incorporate the appropriate provisions, including schedules (and the provision for extension of such schedules) of this Agreement into such permits.

21. Nothing in this Agreement shall alter the DOE's authority with respect to removal actions conducted pursuant to Section 104 of CERCLA, 42 U.S.C. Sec. 9604, as provided by Executive Order 12580.

#### ARTICLE V. DEFINITIONS

22. Except as noted below or otherwise explicitly stated, the appropriate definitions provided in CERCLA, RCRA, the NCP, Ch. 70.105 RCW and Ch. 173-303 WAC shall control the meaning of terms used in this Agreement. In addition:

A. "Action Plan" means the implementing document for this Agreement, which is set forth as Attachment 2 and by this reference incorporated into this Agreement. The term includes all amendments to that document, which the Parties anticipate will be made periodically.

B. "Additional Work" means any new or different work outside the originally agreed upon scope of work, which is determined pursuant to Article XXX (Additional Work).

C. "Agreement" means this document and includes all attachments, addenda and modifications to this document, which are required to be written and to be incorporated into or appended to this document.

D. "Applicable or Relevant and Appropriate Requirements" (ARAR) means any standard, requirement, criteria or limitation as provided in Section 121(d)(2) of CERCLA.

E. "Article" means a subdivision of this Agreement which is identified by a Roman numeral.

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F. "Authorized Representative" is any person, including a contractor, who is specifically designated by a Party to have a defined capacity, including an advisory capacity.

G. "Days" mean calendar days, unless otherwise specified. Any submittal, written notice of position or written statement of dispute that would be due under the terms of this Agreement on a Saturday, Sunday or federal or state holiday shall be due on the following business day.

H. "Dispute Resolution" means the process for resolving disputes that arise under this Agreement.

I. "DOE" or "US DOE" means the United States Department of Energy, its employees and Authorized Representatives.

J. "Ecology" means the State of Washington Department of Ecology, its employees and Authorized Representatives.

K. "EPA" means the United States Environmental Protection Agency, its employees and Authorized Representatives.

L. "Hanford," "Hanford Site," or "Site" means the approximately 560 square miles in Southeastern Washington State (excluding leased land, State owned lands, and lands owned by the Bonneville Power Administration) which is owned by the United States and which is commonly known as the Hanford Reservation (see map at Figure 7-1 in the Action Plan). This definition is not intended to limit CERCLA or RCRA authority regarding hazardous wastes, substances, pollutants or contaminants which have migrated off the Hanford Site.

M. "Hazardous Substance" is defined in CERCLA Section 101(14).

N. "Hazardous Waste" are those wastes included in the definitions at RCRA Section 1004(5) and RCW 70.105.010(15).

O. "HWMA" shall mean the Hazardous Waste Management Act as codified at Ch. 70.105 RCW, and its implementing regulation at Ch. 173-303 Washington Administrative Code.

P. "HWSA" shall mean the Hazardous and Solid Waste Amendments of 1984, P.L. 98-616.

Q. "HWSA Corrective Action" means those corrective action requirements set forth in Sections 3004(u) and (v) and 3008(h) of RCRA; and, upon authorization pursuant to Section 3006 of RCRA, state equivalents.

R. "Lead Regulatory Agency" is that regulatory agency (EPA or Ecology) which is assigned primary administrative and technical responsibility with respect to actions under this Agreement at a particular Operable Unit pursuant to Section 5.6 of the Action Plan. The designation of a Lead Regulatory Agency shall not change the jurisdictional authorities of the Parties.

S. "Radioactive Mixed Waste" or "Mixed Waste" are wastes that contains both hazardous waste subject to RCRA, as amended, and radioactive waste subject to the Atomic Energy Act of 1954, as amended.

T. "Operable Unit" means a discrete portion of the Hanford Site, as identified in Section 3.0 of the Action Plan.

U. "Paragraph" means a numbered paragraph (including subparagraphs) of this Agreement.

V. "Part" means one of the five major divisions of this Agreement.

W. "RCRA" means the Resource Conservation and Recovery Act, 42 U.S.C. Section 6901 et seq., as amended. For purposes of this Agreement, "RCRA" also includes HWMA, Ch. 70.105 RCW.

X. "RCRA Permit" means a permit under RCRA and/or HWMA for treatment, storage or disposal of hazardous waste.



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Y. "Timetables and deadlines" means major and interim milestones and all work and actions (not including target dates) as delineated in the Action Plan and supporting work plans (including performance of actions established pursuant to the Dispute Resolution procedures set forth in this Agreement).

Z. "TSD Group" means a grouping of TSD (treatment, storage or disposal) Units for the purpose of preparing and submitting a permit application and/or closure plan pursuant to the requirements under RCRA, as determined in the Action Plan.

AA. "TSD Unit" means a treatment, storage or disposal Unit which is required to be permitted and/or closed pursuant to RCRA requirements as determined in the Action Plan.

BB. "Waste Management Unit" means an individual location on the Hanford Site where waste has or may have been placed, either planned or unplanned, as identified in the Action Plan.

## PART TWO

### PERMITTING/CLOSURE OF TSD UNITS/GROUPS

#### ARTICLE VI. FINDINGS AND DETERMINATIONS

23. The following paragraphs of this Article constitute a summary of the facts upon which EPA and Ecology are proceeding for purposes of Part Two of this Agreement. None of the facts related herein shall be considered admissions by any Party. This Article contains findings by EPA and Ecology, and shall not be used by any person related or unrelated to this Agreement for purposes other than determining the basis of this Agreement.

A. In and/or before 1943, the United States acquired approximately 560 square miles of land, now known as the Hanford Reservation. The DOE and its predecessors have operated Hanford continuously since 1943, mainly for the production of special nuclear materials for the national defense.

B. On or about August 14, 1980, DOE submitted a Notice of Hazardous Waste Activity to EPA pursuant to Section 3010 of RCRA, identifying DOE as a generator, transporter and owner and operator of a TSD Facility. On or about November 1980, DOE submitted Part A of its permit application to EPA qualifying for interim status pursuant to Section 3005 of RCRA. DOE's Part A was modified by DOE and submitted to EPA and/or Ecology on at least four occasions, including most recently on May 20, 1988. The revised Part A application submitted on May 20, 1988, related to activities involving Mixed Waste.

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C. DOE operates and has operated since November 19, 1980, a hazardous waste management facility engaged in the treatment, storage, and disposal of Hazardous Wastes which are subject to regulation under RCRA and/or the Washington State Hazardous Waste Management Act, Ch. 70.105 RCW.

D. Since the establishment of the Hanford Site in 1943, materials subsequently defined as Hazardous Substances, pollutants and contaminants by CERCLA, materials defined as Hazardous Waste and constituents by RCRA and/or Ch. 70.105 RCW, have been produced, and disposed of or released, at various locations at the Hanford Site, including TSD Units.

24. Based upon the Finding of Fact set forth in Paragraph 23, and the information available, and without admission by DOE, EPA and Ecology have determined the following:

A. Pursuant to Sec. 6001 of RCRA, 42 U.S.C. Section 6961, DOE is subject to and must comply with RCRA and the Washington State Hazardous Waste Management Act, Ch. 70.105 RCW.

B. The Hanford Site includes certain hazardous waste treatment, storage, and disposal Units authorized to operate under Section 3005(e) of RCRA, 42 U.S.C. Sec. 6925(e), and is subject to the permit requirements of Section 3005 of RCRA.

C. Certain wastes and constituents at the Hanford Site are Hazardous Wastes or hazardous constituents as defined by Section 1004(5) of RCRA, 42 U.S.C. Sec. 6903(5), and 40 CFR Part 261. There are also Hazardous Wastes or hazardous constituents at the Hanford Site within the meaning of Ch. 70.105 RCW and WAC 173-303.

D. The Hanford Site constitutes a facility within the meaning of Sections 3004 and 3005 of RCRA, 42 U.S.C. Secs. 6924 and 6925, and RCW 70.105.

E. The DOE is the owner of the Hanford Site.

25. The submittals, actions, schedules, and other elements of work required or imposed by this Agreement are reasonable and necessary to protect the public health and welfare and the environment.

#### ARTICLE VII. WORK

26. DOE agrees to perform the work described in this Article VII in accordance with the Action Plan. The Action Plan delineates the actions to be taken, schedules for such actions, and establishes the overall plan to conduct RCRA permitting and closures, and remedial or corrective action under CERCLA or RCRA. The Action Plan lists the Hanford TSD Units and TSD Groups which are subject to permitting and closure under this Agreement. Additional TSD Units may be listed as they are identified. Units listed in Appendix B of the Action Plan are subject to regulation under RCRA and Ch. 70.105 RCW. Ecology agrees to provide DOE with guidance and timely response to requests for guidance to assist DOE in the performance of its work under Part Two of this Agreement.

27. DOE shall comply with RCRA Permit requirements for TSD Units specifically identified for permitting or closure by the Action Plan and shall submit permit applications in accordance with the Action Plan. EPA shall issue the HSWA provisions of such permits until such authority is delegated to Ecology pursuant to Section 3006 of RCRA. EPA and Ecology shall review such permit applications in accordance with applicable law. The RCRA Permit, whether issued by Ecology and EPA, or Ecology alone after delegation of HSWA authority, shall reference the terms of this Agreement, and provide that compliance with this Agreement and corrective action permit conditions developed pursuant to this Agreement shall satisfy all substantive corrective action requirements of RCRA/HSWA.

28. DOE shall bring its facility into compliance with RCRA requirements specified in the Action Plan according to the schedule set forth therein. DOE shall comply with RCRA closure requirements under applicable regulations for those TSD Units specifically identified in the Action Plan. DOE shall implement closures in accordance with the Action Plan. Closures under this Article shall be regulated by Ecology under applicable law, but shall, as necessary, be coordinated with remedial action requirements of Part Three.

29. If Ecology determines that DOE is violating or has violated any RCRA requirement of this Agreement, and that formal enforcement action is appropriate, it will notify DOE in writing of the following: the facts of the violation(s); the regulation(s) or statute(s) violated; and Ecology's intention to take formal enforcement action; provided, however, that no such notice will necessarily be given for violations that Ecology considers egregious. The purpose of providing this notice is to allow DOE an opportunity to identify any facts it believes are erroneous. This notice shall be sent to the Program Manager for DOE's Office of Environmental Assurance, Permits & Policy no later than seven (7) days before Ecology intends to take formal enforcement action. This notice (or the failure to give notice of violations that Ecology considers egregious) shall not be subject to dispute resolution under this Agreement. If Ecology takes formal enforcement action, the adequacy of the notice provided pursuant to this paragraph may not be challenged in any appeal. For purposes of this paragraph, taking "formal enforcement action" means issuing an order and/or penalty under chapter 70.105 RCW.

ARTICLE VIII. RESOLUTION OF DISPUTES

30. Except as otherwise specifically provided in this Agreement, if DOE objects to any Ecology disapproval, proposed modification, decision or determination made pursuant to Part Two of this Agreement (or Part Three requirements imposed by Ecology pursuant to HSWA provisions upon authorization) it shall notify Ecology in writing of its objection within seven (7) days of receipt of such notice. Thereafter, DOE and Ecology shall make reasonable efforts to informally resolve disputes at the unit manager level. If resolution cannot be achieved at this level within thirty (30) days after Ecology's receipt of DOE's objection, the objection shall be elevated to Ecology's Project Manager who shall continue to make reasonable efforts to resolve the dispute at the Project Manager level. Ecology's Project manager shall issue a written decision or determination no later than forty-four (44) days after Ecology's receipt of DOE's objections. These Dispute Resolution provisions shall not apply to Dangerous Waste permit actions which are otherwise subject to administrative or judicial appeal. These Dispute Resolution provisions shall not apply to enforcement actions which are otherwise subject to administrative or judicial appeal, except that these Dispute Resolution provisions shall apply in the event of the assessment of stipulated penalties under Article IX.

A. Within ten (10) days after receipt of the Project Manager's decision, DOE may submit to the Dispute Resolution Committee (DRC) a written statement of dispute setting forth the nature of the dispute, the disputing Party's position with respect to the dispute, the information the disputing Party is relying upon to support its position, and a description of the steps taken to try to resolve the dispute. The DRC will serve as a forum for resolution of disputes for which agreement has not been reached through

informal dispute resolution. The Parties agree to utilize the Dispute Resolution process only in good faith and agree to expedite, to the extent possible, the Dispute Resolution process whenever it is used. Any challenge as to whether a dispute is raised in good faith shall be subject to the provisions of this Article and addressed as part of the underlying dispute.

B. The Ecology designated member of the DRC is the Assistant Director for Waste Management. DOE's designated member of the DRC is the Program Manager, Office of Environmental Assurance, Permits & Policy of the Richland Operations Office. Notice of any delegation of authority from a Party's designated member on the DRC shall be provided to the other Party.

C. During the ten (10) day period preceding the submittal of the written statement to the DRC, the Parties may engage in informal dispute resolution among the Project Managers. During this informal dispute resolution period, the Parties may meet as many times as necessary to discuss and attempt resolution of the dispute.

D. Following elevation of a dispute to the DRC, the DRC shall have twenty-one (21) days to unanimously resolve the dispute. If the DRC is unable to unanimously agree on a resolution of the dispute, the Director of Ecology shall make a final written decision or written determination no more than thirty-five (35) days after elevation of the dispute to the DRC. Upon request and prior to resolution of the dispute, the Director shall meet with the Manager of DOE-RL to discuss the matter. Any such meeting shall not extend the deadline by which the Director of Ecology shall make a final decision or determination. All parties agree that this final decision or determination shall be deemed to have been decided as an adjudicative proceeding and that DOE may challenge Ecology's final decision or determination as provided by and subject to the standards contained in Ch. 34.05 RCW. If DOE objects to the

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decision or determination, DOE may file an appeal, at DOE's discretion, in either the Pollution Control Hearing Board (PCHB) or in the courts. If DOE elects to file an appeal from the decision directly in the courts, Ecology agrees that it will not raise an argument that initial jurisdiction of the matter should lie with the PCHB.

E. Any deadline in the Dispute Resolution process may be extended with the consent of Ecology and DOE.

F. The pendency of any dispute under this Article shall not affect DOE's responsibility for timely performance of the work required by this Agreement, except that, when DOE has delivered a change request to Ecology one hundred and ten (110) days or more in advance of when a milestone or other enforceable schedule or deadline under this Agreement is due and Ecology's action on the change request has been disputed under this Article, the time period for completion of work directly affected by such dispute shall be extended for at least a period of time equal to the actual time taken to resolve any good faith dispute beyond ninety-six (96) days. In accordance with the procedures specified in Article XL (Extensions) and Section 12 of the Action Plan, the Parties may agree to extend or postpone any milestone or other enforceable schedule or deadline under this Agreement during the pendency of any dispute. All elements of the work required by this Agreement which are not directly affected by the dispute shall continue and be completed in accordance with this Agreement.

G. In the event that Ecology assesses stipulated penalties under Article IX and DOE disputes the matter under this Article VIII, stipulated penalties with respect to the disputed matter shall continue to accrue but payment shall be stayed pending resolution of the dispute. Notwithstanding the stay of payment, stipulated penalties shall accrue from the first day of



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noncompliance with any applicable provision of the Agreement. In the event that Energy does not prevail on the disputed issue, stipulated penalties may be assessed and shall be paid as provided in Article IX.

H. When Dispute Resolution is in progress, work affected by the dispute will immediately be discontinued if Ecology requests, in writing, that such work be stopped, and states the reason as to why stoppage is required. After stoppage of work, if DOE believes that the work stoppage is inappropriate, DOE may meet with Ecology to discuss the work stoppage. Within twenty-one (21) days of this meeting, Ecology will issue a final written decision with respect to the stoppage. This final written decision of the Ecology Project Manager may immediately be subjected to dispute resolution at the DRC level.

I. DOE shall abide by all terms and conditions of a final resolution of any dispute. Within twenty-one (21) days of the final resolution of any dispute under this Article, or under any appeal action, DOE shall incorporate the resolution and final determination into the appropriate plan, schedule or procedure(s) and proceed to implement this Agreement according to the amended plan, schedule or procedure(s). DOE shall notify Ecology as to the action(s) taken to comply with the final resolution of a dispute.

J. Under the applicable portions of the Action Plan attached to this Agreement, Ecology will make final written decisions or determinations regarding compliance with Ch. 70.105 RCW. Disputes regarding these decisions or determinations shall be resolved utilizing the procedures described above, except as otherwise specifically provided in this Agreement. Ecology will also be making certain decisions and determinations as Lead Regulatory Agency

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at certain CERCLA units pursuant to the Action Plan. Disputes involving Ecology's CERCLA decisions or determinations shall be resolved utilizing the Dispute Resolution process in Part Three, Article XVI.

K. When DOE submits RCRA Permit applications, closure plans, and post-closure plans required under Ch. 70.105 RCW which are deficient, Ecology, as appropriate, may respond with a Notice of Deficiency (NOD) documenting revisions necessary for compliance, or may, in the event the submission is found by Ecology to be not in good faith or to contain significant deficiencies, assess stipulated penalties in accordance with Article IX. In the event that NOD(s) are issued, the first two NODs on any submittal shall not be subject to the formal dispute resolution process. Any subsequent NOD may be so subject. Ecology and DOE may agree, however, to subject any NOD to dispute resolution.

#### ARTICLE IX. STIPULATED DANGEROUS WASTE PENALTIES

31. In the event that DOE fails to submit a Primary Document pursuant to the appropriate timetable or deadline or fails to comply with a term or condition of Part Two of this Agreement including milestones (or Part Three Corrective Action requirements upon authorization of Ecology to implement such requirements), Ecology may assess a stipulated penalty against DOE. A stipulated penalty may be assessed in an amount up to \$5,000 for the first week (or part thereof), and up to \$10,000 for each additional week (or part thereof) for which a failure set forth in this Paragraph occurs.

If the failure in question is not already subject to Dispute Resolution at the time such assessment is received, DOE shall have seven (7) days after receipt of the assessment to invoke Dispute Resolution on the question of whether the failure did in fact occur. DOE shall not be liable

for the stipulated penalty assessed by Ecology if the failure is determined, through the Dispute Resolution process, not to have occurred. No assessment of a stipulated penalty shall be final until the conclusion of dispute resolution procedures on DOE's failure to comply.

32. The annual reports required by Section 120(e)(5) of CERCLA shall include, with respect to each final assessment of a stipulated penalty against DOE under this Agreement, each of the following:

- A. The facility responsible for the failure;
- B. A statement of the facts and circumstances giving rise to the failure;
- C. A statement of any administrative or other corrective action taken at the relevant facility, or a statement of why such measures were determined to be inappropriate;
- D. A statement of any additional action taken by or at the facility to prevent recurrence of the same type of failure; and
- E. The total dollar amount of the stipulated penalty assessed for the particular failure.

33. Stipulated penalties assessed pursuant to this Article shall be payable to the Hazardous Waste Control and Elimination account of the State Treasury.

34. All funds collected by the state from DOE penalties under this Agreement shall be used by the State as provided by the Federal Facility Compliance Act, Section 102(b).

35. In no event shall this Article give rise to a stipulated penalty in excess of the amount set forth in RCRA Section 3008.

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36. This Section shall not affect DOE's ability to request an extension of a timetable, deadline, or schedule pursuant to any Section of this Agreement, including Article XL (Extensions). No penalty shall be assessed for a violation of a timetable, deadline or schedule caused by an event of force majeure as defined under Article XLVII (Force Majeure).

37. Nothing in this Agreement shall be construed to render an employee or authorized representative of DOE personally liable for the payment of any stipulated penalty assessed pursuant to this Article.

38. Nothing in this Agreement shall be construed as prohibiting, altering, or in any way limiting the ability of Ecology to seek any remedies or sanctions available by virtue of DOE's violation of this Agreement or, for matters not specifically addressed by this Agreement, of the statutes and regulations upon which it is based, including but not limited to penalties, pursuant to Ch. 70.105 RCW; provided, however, that the assessment of stipulated penalties shall preclude Ecology from seeking any other penalty payments from DOE under Ch. 70.105 RCW for the same violations.

#### ARTICLE X. ENFORCEABILITY

39. In the event DOE or Ecology fails to comply with the RCRA provisions of this Agreement, the other Party may initiate judicial enforcement of the Agreement. In enforcing the RCRA provisions of this Agreement, a Party may seek injunctive relief, specific performance, sanctions or other relief available under applicable law. DOE and Ecology, prior to seeking enforcement, shall utilize the Dispute Resolution procedures of Article VIII, except as provided in Article XLVI (Reservation of Rights).

40. Part Two, enforceable major and interim milestones, and other RCRA provisions of this Agreement including those related to statutory

requirements, regulations, permits, closure plans, or corrective action, including record keeping and reporting shall be enforceable by citizen suits under Section 7002(a)(1)(A) of RCRA, including actions by the State of Washington, Ecology or other state agencies. DOE agrees that the State or one of its agencies is a "person" within the meaning of Section 7002(a) of RCRA.

41. The Parties agree that the RCRA provisions set forth in this Agreement which address record keeping, reporting, enforceable milestones (excluding target dates), regulations, permits, closure plans, or corrective action are RCRA statutory requirements and are thus enforceable by the Parties.

#### ARTICLE XI. SCHEDULE

42. A. Tank waste remediation system milestones will be established in accordance with Section 11.7 of the Action Plan.

B. Except as provided above, specific major and interim milestones, as agreed to by the Parties, are set forth in the Action Plan.

#### ARTICLE XII. COMMON TERMS

43. The provisions of Parts Four, and Five, Articles XXIII through LI below, apply to this Part Two and are incorporated herein by reference.

## PART THREE

### REMEDIAL AND CORRECTIVE ACTIONS

#### ARTICLE XIII. FINDINGS AND DETERMINATIONS

44. The following paragraphs of this Article constitute a summary of the facts upon which EPA and Ecology are proceeding for purposes of Part Three of this Agreement. None of the facts related herein shall be considered admissions by any Party. This Article contains findings by EPA and Ecology, and shall not be used by any person related or unrelated to this Agreement for purposes other than determining the basis of this Agreement.

A. In and/or before 1943, the United States acquired approximately 560 square miles of land, now known as the Hanford Site. The DOE and its predecessors have operated Hanford continuously since 1943, mainly for the production of special nuclear materials for the national defense.

B. Since the establishment of the Hanford Site in 1943, materials subsequently defined as hazardous substances, pollutants and contaminants by CERCLA, materials defined as hazardous waste and constituents by RCRA and/or Ch. 70.105 RCW, have been produced, and disposed of, or released, at various locations at the Hanford Site, including TSD Units.

C. Certain hazardous substances, contaminants, pollutants, hazardous wastes and constituents remain on and under the Hanford Site, and have been detected in groundwater and surface water at the Hanford Site.

D. Groundwater, surface water and air pathways provide routes for the migration of Hazardous Substances, pollutants, contaminants, and Hazardous Wastes and constituents from the Hanford Site into the environment.

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E. An estimated five billion cubic yards of solid and dilute liquid wastes, which include hazardous substances, mixed waste, and hazardous waste and constituents have been disposed of at the Hanford Site. Significant above-background concentrations of hazardous substances, including chromium, strontium-90, tritium, iodine-129, uranium, cyanide, carbon tetrachloride, nitrates, and technetium-99 have been detected in the groundwater (unconfined aquifer) at the Hanford Site. These materials have toxic, carcinogenic, mutagenic, or teratogenic effects on humans and other life forms.

F. The Hanford Site is adjacent to the Columbia River. Approximately 70,000 people use groundwater and surface water obtained within three miles of the Hanford Site for drinking. This same water is used to irrigate approximately 1,000 acres.

G. The migration of such materials presents a threat to the public health, welfare and the environment.

H. On or about September 14, 1987, DOE voluntarily undertook and provided to EPA information and data on the Hanford Site, which supported nomination of four aggregate areas on the Hanford Site for inclusion on the NPL, pursuant to CERCLA. EPA, by letter dated April 22, 1988, deemed this information and data to be the functional equivalent of a Site Preliminary Assessment and Site Investigation (PA/SI). EPA subsequently placed the Hanford Site on the Federal Agency Hazardous Waste Compliance Docket, 52 Fed. Reg. 4280 (February 12, 1988). On June 24, 1988, EPA proposed inclusion of four subareas of the Hanford Site on the NPL.

45. Based on the Findings of Fact set forth in paragraph 44, and the information available, and without admission by DOE, EPA and Ecology have determined the following:

A. DOE is a person as defined in Section 101(a) of CERCLA, 42 U.S.C. Sec. 9601(a).

B. The DOE Hanford Site located in Washington State constitutes a facility within the meaning of 42 U.S.C. Sec. 9601(9).

C. Hazardous Substances, and pollutants or contaminants within the meaning of 42 U.S.C. Secs. 9601(14) and (33) and 9604(a)(2) have been disposed of or released at the Hanford Site.

D. There have been releases and there continue to be releases and threatened releases of Hazardous Substances, and pollutants or contaminants into the environment within the meaning of 42 U.S.C. Secs. 9601(22), 9604, 9606 and 9607 at and from the Hanford Site.

E. With respect to those releases and threatened releases, DOE is a responsible person within the meaning of 42 U.S.C. Sec. 9607.

F. The Hanford Site includes certain hazardous waste treatment, storage, and disposal Units authorized to operate under Section 3005(e) of RCRA, 42 U.S.C. Sec. 6925(e), and Ch. 70.105 RCW and 173-303 WAC, which are subject to the permit requirements of RCRA.

G. Certain wastes and constituents at the Hanford Site are Hazardous Wastes or hazardous constituents thereof as defined by Section 1004(5) of RCRA, 42 U.S.C. Sec. 6903(5) and 40 CFR Part 261. There are also Hazardous Wastes or hazardous constituents at the Hanford Site within the meaning of Ch. 70.105 RCW and 173-303 WAC.

H. There is or has been a release of Hazardous Wastes and/or hazardous constituents into the environment from the Hanford Site.

I. The Hanford Site constitutes a facility within the meaning of Sections 3004 and 3005 of RCRA, 42 U.S.C. Secs. 6924 and 6925, and RCW 70.105.

J. The DOE is the owner of the Hanford Site.



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K. The submittals, actions, schedules, and other elements of work required or imposed by this Agreement are reasonable and necessary to protect the public health and welfare and the environment.

#### ARTICLE XIV. WORK

46. DOE agrees to perform the work described in this Article XIV in accordance with the Action Plan. EPA and Ecology agree to provide DOE with guidance and timely response to requests for guidance to assist DOE in its performance of work under Part Three of this Agreement. Upon delegation of authority for RCRA Subtitle C corrective action provisions to Ecology pursuant to Section 3006 of RCRA, Ecology will administer such authority in accordance with this Agreement and issue the corrective action portion of the TSD permits. However, the selection of remedial or corrective action shall continue to be governed by Part Three of this Agreement both before and after such time as the State becomes authorized pursuant to Section 3006 of RCRA by EPA. Upon such authorization, however, disputes between DOE and Ecology arising under this Part which involve provisions of Subtitle C of RCRA for which the State is authorized shall be resolved in accordance with Article VIII (Resolution of Disputes).

47. Interim Response Actions. DOE agrees that it shall develop and implement Interim Response Actions (IRAs) at operable units being managed under CERCLA corrective action authority, as required by EPA, or Ecology if it is the lead regulatory agency, and as set forth in Chapter 7.0 of the Action Plan. The IRAs shall be consistent with the purposes set forth in Article III (Purpose) of this Agreement. EPA, in consultation with DOE and Ecology, shall make the selection of the interim response action(s). In the event of dispute by DOE or Ecology, the final selection of the interim response action(s) shall

be made by the EPA Administrator, and shall not be subject to dispute by the Parties. IRAs shall, to the greatest extent practicable, attain ARARs and be consistent with and contribute to the efficient performance of final response actions. A dispute arising under this Article on any matter other than EPA's final selection of an interim response action shall be resolved pursuant to Article XVI (Resolution of Disputes).

48. Interim Measures. DOE agrees that it shall develop and implement Interim Measures (IMs) at operable units being managed under RCRA corrective action authority, as required by the lead regulatory agency, and as set forth in Chapter 7.0 of the Action Plan. The IMs shall be consistent with the purposes set forth in Article III (Purpose) of this Agreement. If Ecology is the lead regulatory agency it shall recommend interim measures, in consultation with DOE and EPA. EPA shall select interim measures until Ecology is authorized pursuant to Section 3006 of RCRA for HSWA corrective action, at which time Ecology shall select the interim measures. IMs shall to the greatest extent practicable be consistent with and contribute to efficient performance of corrective actions. A dispute arising under this paragraph shall be resolved pursuant to Article XVI, except that if the dispute concerns requirements imposed by Ecology after HSWA authorization pursuant to Section 3006 of RCRA, such disputes shall be resolved pursuant to Article VIII.

49. RCRA Facility Assessments. DOE agrees it shall develop, implement and report upon RCRA Facility Assessments (RFAs) which comply with applicable requirements of RCRA, the RCRA regulations, and pertinent written guidance and established written EPA policy, and which are in accordance with

the requirements and time schedules set forth in the Action Plan. Such assessment may be done for an entire Operable Unit, or individual Waste Management Units within an Operable Unit.

50. Remedial Investigations. DOE agrees it shall develop, implement and report upon remedial investigations (RIs) which comply with applicable requirements of CERCLA, the National Contingency Plan (NCP), and pertinent written guidance and established written EPA policy, and which is in accordance with the requirements and time schedules set forth in the Action Plan.

51. RCRA Facility Investigations. DOE agrees it shall develop, implement and report upon RCRA facility investigations (RFIs) which comply with applicable requirements of RCRA, the RCRA regulations, and pertinent written guidance and established written EPA policy, and which is in accordance with the requirements and time schedules set forth in the Action Plan.

52. Feasibility Studies. DOE agrees it shall design, propose, undertake and report upon feasibility studies (FSs) which comply with applicable requirements of CERCLA, the National Contingency Plan (NCP), and relevant guidance and established EPA policy, and which is in accordance with the requirements and time schedules set forth in the Action Plan.

53. Corrective Measures Studies. DOE agrees it shall design, propose, undertake and report upon corrective measure studies (CMSs) which comply with applicable requirements of RCRA, the RCRA regulations, and relevant written guidance and established written EPA policy, and which is in accordance with the requirements and time schedules set forth in the Action Plan.

54. Remedial and Corrective Actions. DOE shall develop and submit its proposed remedial action (or corrective action) alternative following completion and approval of an RI and FS (or RCRA RFI and CMS), in accordance with the requirements and schedules set forth in the Action Plan. If Ecology is the lead regulatory agency, it may recommend the CERCLA remedial action(s) it deems appropriate to EPA. In addition, prior to authorization of Ecology for RCRA corrective action, Ecology may recommend RCRA corrective action it deems appropriate to EPA. The EPA Administrator, in consultation with the DOE and Ecology, shall make final selection of the CERCLA remedial action(s), and RCRA corrective action(s) prior to corrective action authorization. After authorization, and in accordance with the Action Plan, Ecology in consultation with DOE and EPA shall select the RCRA corrective action(s). The final selection of remedial action(s) and RCRA corrective action(s) by the Administrator shall be final and not subject to dispute. Notwithstanding this Article, or any other Article of this Agreement, the State may seek judicial review of an interim or final remedial action in accordance with Sections 113 and 121 of CERCLA, 42 U.S.C. Secs. 9613 and 9621.

55. Implementation of Remedial and Corrective Actions. Following final selection, DOE shall design, propose and submit to EPA and Ecology, a detailed plan for implementation of each selected remedial action(s) and RCRA corrective action(s), which shall include operations and maintenance plans, appropriate timetables and schedules. Following review and approval by the lead regulatory agency, DOE shall implement the remedial action(s) and RCRA corrective action(s) in accordance with the requirements and time schedules set forth in the Action Plan to this Agreement. A dispute arising under this Article on any matter other than EPA's final selection of a remedial action shall be resolved pursuant to Article XVI (Resolution of Disputes).

56. All work described above, whether labeled "remedial action" or "corrective action," and whether performed pursuant to CERCLA and an RI/FS or the RCRA/HSWA equivalent shall be governed by this Part Three. CERCLA remedial action and, as appropriate, HSWA corrective action shall meet ARARs in accordance with CERCLA Section 121.

57. Notwithstanding any part of this Agreement, Ecology may obtain judicial review of any final decision of EPA on selection of a final remedial action at any Operable Unit pursuant to Section 113 of CERCLA. Ecology also reserves the right to obtain judicial review of any ARAR determination pursuant to Section 121 of CERCLA.

#### **ARTICLE XV. REVIEW OF DOCUMENTS**

58. The provisions of Section 9.0 of the Action Plan establish the procedures that shall be used by DOE, EPA, and Ecology to provide the Parties with appropriate notice, review, comment and response to comments regarding RI/FS, Remedial Design and Remedial Action (RD/RA) documents (or RCRA Corrective Action equivalent) specified as either Primary or Secondary Documents in the Action Plan. As of the effective date of this Agreement, all primary documents shall be subject to Dispute Resolution in accordance with Article XVI (Resolution of Disputes). Secondary documents are not subject to Dispute Resolution. In accordance with Section 120 of CERCLA, DOE will be responsible for issuing primary and secondary documents to EPA and Ecology. The lead regulatory agency shall be responsible for consolidating comments and providing responses to DOE on all required submittals for the Operable Units for which it is the designated Lead Regulatory Agency. No guidance,

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suggestions, or comments by Ecology or EPA will be construed as relieving DOE of its obligation to obtain formal approval required by Part Three of this Agreement.

**ARTICLE XVI. RESOLUTION OF DISPUTES**

59. If a dispute arises under Part Three of this Agreement or as specifically set forth elsewhere in this Agreement, the procedures of this Article shall apply. These procedures shall not apply, however, where otherwise specifically excluded. The Parties to this Agreement shall make reasonable efforts to informally resolve disputes among Project Managers or their immediate supervisors. Except as provided in Paragraph 46, if resolution cannot be achieved informally, the procedures of this Article shall be implemented to resolve a dispute. These Dispute Resolution provisions shall not apply to RCRA permit actions which are otherwise subject to administrative or judicial appeal. These Dispute Resolution provisions shall not apply to enforcement actions which are otherwise subject to administrative or judicial appeal, except that these Dispute Resolution provisions shall apply in the event of the assessment of stipulated penalties.

A. Within thirty (30) days after: (1) the period established for review of a primary document pursuant to Article XV (Review of Documents), or (2) any action which leads to or generates a dispute, the disputing Party shall submit to the other Parties a written statement setting forth the nature of the dispute, the work affected by the dispute, the disputing Party's position with respect to the dispute, the information the disputing Party is relying upon to support its position, and a description of all steps taken to resolve the dispute.

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B. Prior to issuance of a written statement of dispute, the disputing Parties shall engage the other Parties in informal Dispute Resolution among the Project Managers and/or their immediate supervisors. During this informal Dispute Resolution period the Parties shall meet as many times as necessary to discuss and attempt resolution of the dispute.

C. If agreement cannot be reached on any issue within the informal Dispute Resolution period, the disputing Party shall forward the written statement of dispute to the Dispute Resolution Committee ("DRC") within the 30 days specified in subparagraph A above, thereby elevating the dispute to the DRC for resolution.

D. The DRC will serve as a forum for resolution of disputes for which agreement has not been reached through informal dispute resolution. The Parties shall each designate in writing one individual and an alternate to serve on the DRC. The individuals designated to serve on the DRC shall be employed at the policy level or be delegated the authority to participate on the DRC for the purposes of dispute resolution under this Agreement. The EPA representative on the DRC is the Hazardous Waste Division Director of EPA's Region 10. DOE's representative on the DRC is the Program Manager, Office of Environmental Assurance, Permits & Policy, of the Richland Operations Office. Ecology's representative on the DRC is the Assistant Director for Waste Management. Written notice of any delegation of authority from a Party's designated representative on the DRC shall be provided to all other Parties pursuant to the procedures of Article XXXIII (Notification).

E. Following elevation of a dispute to the DRC, the DRC shall have twenty-one (21) days to unanimously resolve the dispute and issue a written decision. If the DRC is unable to unanimously resolve the dispute within this

21-day period, the written statement of dispute shall be forwarded by the disputing Party within seven (7) days to the Senior Executive Committee ("SEC") for resolution.

F. The SEC will serve as the forum for resolution of disputes for which agreement has not been reached by the DRC. EPA's representative on the SEC is the Regional Administrator of EPA Region 10. Ecology's representative on the SEC is its Director. DOE's representative on the SEC is the DOE Richland Operations Manager. The SEC members shall, as appropriate, confer, meet and exert their best efforts to resolve the dispute. The SEC shall have twenty-one (21) days to unanimously resolve the dispute.

G. If unanimous resolution of the dispute is not reached within twenty-one (21) days, EPA's Regional Administrator shall issue a final written decision resolving the dispute within 14 days. This authority can not be delegated. The time for issuing a final decision may be extended by EPA upon notice to the other parties. If the dispute involves a decision where Ecology serves as the lead regulatory agency, EPA's Regional Administrator shall consult with the Director of Ecology before issuing a final written decision.

H. Within fourteen (14) days of the Regional Administrator's issuance of the final written decision on the dispute, DOE may request that the Administrator of EPA resolve the dispute if the Secretary of Energy determines that the decision of the Regional Administrator has significant national policy implications. The request must be in writing, and must identify the basis for the determination by the Secretary that the decision has significant national policy implications. If no such request is made within the 14 day period, DOE shall be deemed to have agreed with the Regional Administrator's written decision. If such a request is made, the Administrator will review and resolve the dispute in accordance with



applicable law and regulations within twenty-one (21) days. Upon request and prior to resolving the dispute, the Administrator may meet and confer with all the Parties to discuss the issues under dispute. The Administrator shall provide five (5) days advance notice of such meeting to all Parties in order to afford the Parties the opportunity to attend. Upon resolution, the Administrator shall provide the Parties with a written final decision setting forth resolution of the dispute. The duties of the EPA Administrator and Secretary of Energy set forth in this Article XVI shall not be delegated.

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I. The pendency of any dispute under this Part shall not affect DOE's responsibility for timely performance of the work required by this Agreement, except that, when DOE has delivered a change request to EPA one hundred seven (107) days or more in advance of when a milestone or other enforcement schedule or deadline under this Agreement is due and EPA's action on the change request has been disputed under this Article, the time period for completion of work directly affected by such dispute shall be extended for a period of time usually not to exceed the actual time taken to resolve any good faith dispute beyond ninety-three (93) days. In accordance with the procedures specified in Article XL (Extensions) and Section 12 of the Action Plan, the Parties may agree to extend or postpone any milestone or other enforceable schedule or deadline under this Agreement during the pendency of any dispute. All elements of the work required by this Agreement which are not directly affected by the dispute shall continue and be completed in accordance with this Agreement.

J. In the event that EPA assesses stipulated penalties under Article XX (Stipulated Penalties) and DOE disputes the matter under this Article XVI, stipulated penalties with respect to the disputed matter shall continue to accrue but payment shall be stayed pending resolution of the

dispute. Notwithstanding the stay of payment, stipulated penalties shall accrue from the first day of noncompliance with any applicable provision of the Agreement. In the event that Energy does not prevail on the disputed issue, stipulated penalties may be assessed and shall be paid as provided in Article XX (Stipulated Penalties).

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K. When Dispute Resolution is in progress, work affected by the dispute will immediately be discontinued if the Hazardous Waste Division Director for EPA'S Region 10, after consultation with Ecology, requests in writing that such work be stopped because, in EPA'S opinion, such work is inadequate or defective, and such inadequacy or defect is likely to yield an adverse affect on human health and environment, or is likely to have a substantial adverse affect on the remedy selection or implementation process. To the extent possible, EPA shall give DOE prior notification that a work stoppage request is forthcoming. After stoppage of work, if DOE believes that the work stoppage is inappropriate, DOE may meet with the Division Director and Ecology to discuss the work stoppage. Following this meeting, and further consideration of the issues, the Division Director, after consultation with Ecology, will issue a final written decision with respect to the stoppage. This final written decision may immediately be subjected to formal dispute resolution. Such dispute may be brought directly to the DRC or the SEC, at the discretion of DOE.

L. Within twenty-one (21) days of resolution of any dispute, DOE shall incorporate the resolution and final determination into the appropriate plan, schedule or procedures and proceed to implement this Agreement according to the amended plan, schedule or procedures.

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M. Resolution of a dispute pursuant to this Article constitutes final resolution of the dispute and all Parties shall abide by all terms and conditions of such final resolution.

#### **ARTICLE XVII SCHEDULE**

60. DOE shall commence Remedial Investigations (RIs) and Feasibility Studies (FSs) for one Operable Unit of each subarea of the Hanford Site included on the NPL within six (6) months after such listing on the NPL. Schedules for such RIs and FSs, are set forth in the Action Plan. The Parties agree that this phased schedule satisfies Section 120(e)(1) of CERCLA. RI/FS schedules for each Operable Unit will be published by EPA and Ecology, as provided in Section 120(e)(1) of CERCLA.

61. DOE shall commence remedial action within fifteen (15) months after completion of the RI/FS (including EPA selection of the remedy) for the first priority Operable Unit, in accordance with Section 120(e)(2) of CERCLA and the schedule in the Action Plan. DOE shall complete the remedial action as expeditiously as possible, as required by CERCLA Section 120(e)(3). In accordance with the schedule(s) in the Action Plan, subsequent remedial action at other operable units shall follow and be completed as expeditiously as possible as subsequent RI/FSs are completed and approved. The Parties agree that this phased schedule satisfies Section 120(e)(2) and (3) of CERCLA.

62. Specific major and interim milestones and schedules, as agreed to by the Parties, are set forth in the Action Plan.

#### **ARTICLE XVIII. PERMITS**

63. The Parties recognize that under CERCLA Secs. 121(d) and 121(e)(1), and the NCP, portions of the response actions called for by this

Agreement and conducted entirely on the Hanford Site are exempted from the procedural requirement to obtain federal, state, or local permits, but must satisfy all the applicable or relevant and appropriate federal and state standards, requirements, criteria or limitations which would have been included in any such permit.

64. When DOE proposes a response action to be conducted entirely on the Hanford Site, which in the absence of CERCLA Sec. 121(e)(1) and the NCP would require a federal or state permit, DOE shall include in the submittal:

A. Identification of each permit which would otherwise be required;

B. Identification of the standards, requirements, criteria, or limitations which would have had to have been met to obtain each such permit;

C. Explanation of how the response action proposed will meet the standards, requirements, criteria or limitations identified in Subparagraph B immediately above.

65. Upon the request of DOE, EPA, and Ecology will provide their positions with respect to Subparagraphs 64 B and C above in a timely manner.

66. This Article is not intended to relieve DOE from any applicable requirements, including Section 121(d)(3) of CERCLA, for the shipment or movement of a hazardous waste or substance off the Hanford Site. DOE shall obtain all permits and comply with applicable federal, state or local laws for such shipments. DOE shall submit timely applications and requests for such permits and approvals. Disposal of hazardous substances off the Hanford Site shall comply with DOE's Policy on Off-Site Transportation, Storage and Disposal of Nonradioactive Hazardous Waste dated June 24, 1986, or as subsequently amended, and the EPA Off-Site Response Action Policy dated May 6, 1985, 50 Federal Register 45933 (November 5, 1985), as amended by EPA's

November 13, 1987 "Revised Procedures for Planning and Implementing Off-Site Response Actions," and as subsequently amended, to the extent required by CERCLA.

67. DOE shall notify Ecology and EPA in writing of any permits required for off-Hanford activities related to this Agreement as soon as DOE-RL becomes aware of the requirement. Upon request, DOE shall provide Ecology and EPA with copies of all such permit applications and other documents related to the permit process.

68. If a permit which is necessary for implementation of off-Hanford activities of this Agreement is not issued, or is issued or renewed in a manner which is materially inconsistent with the requirements of this Agreement, DOE shall notify Ecology and EPA of its intention to propose modifications to this Agreement to comply with the permit (or lack thereof). Notification by DOE of its intention to propose modifications shall be submitted within seven (7) calendar days of receipt by DOE of notification that: (1) a permit will not be issued; (2) a permit has been issued or reissued; (3) a final determination with respect to any appeal related to the issuance of a permit has been entered. Within thirty (30) days from the date it submits its notice of intention to propose modifications, DOE shall submit to Ecology and EPA its proposed modifications to this Agreement with an explanation of its reasons in support thereof.

69. Ecology and EPA shall review DOE's proposed modifications to this Agreement pursuant to this Article. If DOE submits proposed modifications prior to a final determination of any appeal taken on a permit needed to implement this Agreement, Ecology and EPA may elect to delay review

of the proposed modifications until after such final determination is entered. If Ecology and EPA elect to delay review, DOE shall continue implementation of this Agreement as provided in the following paragraph.

70. During any appeal of any permit required to implement this Agreement or during review of any of DOE's proposed modifications as provided in the preceding paragraph, DOE shall continue to implement those portions of this Agreement which can be reasonably implemented pending final resolution of the permit issue(s).

#### ARTICLE XIX. RECOVERY OF EPA CERCLA RESPONSE COSTS

71. EPA and DOE agree to amend this section at a later date in accordance with any subsequent resolution of the currently contested issue of EPA cost reimbursement.

#### ARTICLE XX. STIPULATED PENALTIES

72. In the event that DOE fails to submit a primary document pursuant to the appropriate timetable or deadline in accordance with Part Three of this Agreement, or fails to comply with a term or condition of Part Three of this Agreement which relates to an interim or final remedial or corrective action, including milestones associated with the development, implementation and completion of an RI, FS, RFI or CMS, EPA may assess a stipulated penalty against DOE. If Ecology determines that DOE has failed in a manner as set forth above for which it is the lead regulatory agency, Ecology may identify stipulated penalties to EPA and, unless it is a disputed matter under Paragraph 73, these penalties shall be assessed in accordance with this Article. When Ecology receives authorization from EPA to implement the corrective action provisions of RCRA pursuant to Section 3006 of RCRA,

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stipulated penalties for violations of corrective action requirements will be assessed in accordance with Part Two of this Agreement. A stipulated penalty may be assessed in an amount up to \$5,000 for the first week (or part thereof), and up to \$10,000 for each additional week (or part thereof) for which a failure set forth in this paragraph occurs.

73. Upon determining that DOE has failed in a manner set forth in Paragraph 72 EPA shall so notify DOE in writing. If the failure in question is not or has not already been subject to Dispute Resolution at the time such notice is received, DOE shall have fifteen (15) days after receipt of the notice to invoke Dispute Resolution on the question of whether the failure did in fact occur. DOE shall not be liable for the stipulated penalty assessed by EPA if the failure is determined, through the Dispute Resolution process, not to have occurred. No assessment of a stipulated penalty shall be final until the conclusion of dispute resolution procedures on DOE's failure to comply.

74. The annual reports required by Section 120(e)(5) of CERCLA shall include, with respect to each final assessment of a stipulated penalty against DOE under this Agreement, each of the following:

- A. The facility responsible for the failure;
- B. A statement of the facts and circumstances giving rise to the failure;
- C. A statement of any administrative or other corrective action taken at the relevant facility, or a statement of why such measures were determined to be inappropriate;
- D. A statement of any additional action taken by or at the facility to prevent recurrence of the same type of failure; and
- E. The total dollar amount of the stipulated penalty assessed for the particular failure.

75. Stipulated penalties assessed pursuant to this Article for violations of CERCLA requirements shall be payable to the Hazardous Substances Response Trust Fund from funds authorized and appropriated for that specific purpose.

76. Stipulated penalties assessed pursuant to this Article for violations of RCRA requirements shall be payable to the "Treasurer of the United States." Payment shall be mailed to:

U.S. Environmental Protection Agency

(Region 10)

P.O. Box 360903M

Pittsburgh, Pennsylvania 15251

A transmittal letter, giving DOE's name, complete address, account receivable control number, and case docket number must accompany each payment. A copy of the check and of the transmittal letter that accompanies the check shall be delivered or mailed to the Regional Hearing Clerk at the following address:

U.S. Environmental Protection Agency

Region 10 Hearing Clerk

1200 Sixth Avenue, SO-155

Seattle, Washington 98101

77. In no event shall this Article give rise to a CERCLA stipulated penalty in excess of the amount set forth in CERCLA Section 109. In no event shall this Article give rise to a RCRA stipulated penalty in excess of the amount set forth in RCRA Section 3008.

78. This Article shall not affect DOE's ability to obtain an extension of a timetable, deadline or schedule pursuant to Article XL (Extensions).



79. Nothing in this Agreement shall be construed to render an employee or Authorized Representative of DOE personally liable for the payment of any stipulated penalty assessed pursuant to this Article.

80. Nothing in this Agreement shall be construed as prohibiting, altering, or in any way limiting the ability of EPA to seek any remedies or sanctions available by virtue of DOE's violation of this Agreement or, for matters not specifically addressed by this Agreement, of the statutes and regulations upon which it is based, including but not limited to penalties, pursuant to CERCLA and RCRA; provided, however, that the assessment of stipulated penalties shall preclude EPA from seeking any other penalty payments from DOE under RCRA or CERCLA for the same violations.

#### **ARTICLE XXI. ENFORCEABILITY**

81. The Parties agree that compliance with the terms of this Agreement, including all timetables and deadlines associated with this Agreement shall be construed as compliance with CERCLA Section 120(e)(3).

82. The Parties agree that:

A. Upon the effective date of this Agreement, any standard, regulation, condition, requirement or order which has become effective under CERCLA or is incorporated into Part Three of this Agreement (with the exception of any such obligations which are imposed solely pursuant to Subtitle C of RCRA and are not determined by EPA to be ARARs) is enforceable by any person pursuant to CERCLA Section 310, and any violation of such standard, regulation, condition, requirement or order will be subject to civil penalties under CERCLA Secs. 310(c) and 109;

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B. All timetables or deadlines, associated with the development, implementation and completion of an RI or FS, shall be enforceable by any person pursuant to CERCLA Section 310 and any violation of such timetables or deadlines will be subject to civil penalties under CERCLA Secs. 310(c) and 109;

C. All terms and conditions of this Agreement which relate to interim or final remedial actions, including corresponding timetables, deadlines or schedules, and all work associated with the interim or final remedial actions, shall be enforceable by any person pursuant to CERCLA Section 310 and any violation of such terms or conditions will be subject to civil penalties under CERCLA Secs. 310(c) and 109; and

D. Any final resolution of a dispute pursuant to Article XVI (Resolution of Disputes) which establishes a term, condition, timetable, deadline or schedule shall be enforceable by any person pursuant to CERCLA Section 310(c) and any violation of such term, condition, timetable, deadline or schedule will be subject to civil penalties under CERCLA Secs. 310(c) and 109.

83. Nothing in this Agreement shall be construed as authorizing any person to seek judicial review of any action or work where review is barred by any provision of RCRA or CERCLA, including CERCLA Section 113(h).

84. The Parties agree that all Parties shall have the right to enforce the terms of this Agreement in accordance with its provisions.

#### ARTICLE XXII. COMMON TERMS

85. The provisions of Parts Four and Five, Articles XXIII through LI below, apply to this Part Three and are incorporated herein by reference.

## PART FOUR

### INTEGRATION OF EPA AND ECOLOGY RESPONSIBILITIES

#### ARTICLE XXIII. RCRA/CERCLA INTERFACE

86. Part Two of this Agreement requires DOE to carry out RCRA TSD work under the direction and authority of Ecology. Part Three of this Agreement requires DOE to carry out investigations and cleanup of past practice units through the CERCLA process under the authority of EPA, or through the RCRA Corrective Action process under the authority of EPA for provisions of RCRA for which the State is not authorized and then under the authority of Ecology after such authorization. This Part Four establishes the framework for EPA and Ecology to resolve certain disputes that may arise concerning the respective responsibilities of the two regulatory agencies.

87. EPA and Ecology recognize that there is a potential for the two regulatory agencies to impose conflicting requirements upon DOE, due to the complexities of the Hanford Site (where RCRA TSDs, and past practice units may be in close proximity to each other) and due to the overlap between the respective authorities of the two regulatory agencies. EPA and Ecology intend to carry out their responsibilities so as to minimize the potential for any such conflicts. Either EPA or Ecology shall be lead regulatory agency for oversight of DOE's work for TSD units and past practice units that are a part of the same operable unit.

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ARTICLE XXIV. LEAD REGULATORY AGENCY AND REGULATORY APPROACH DECISIONS

88. The designation of lead regulatory agency and regulatory process for each operable unit shall be made through the Action Plan update process. EPA and Ecology have joint authority to determine the choice of lead regulatory agency and regulatory process, in consultation with DOE, and DOE shall not dispute such joint determinations.

89. If the EPA and Ecology Project Managers cannot agree on the choice of lead agency and/or regulatory process for any operable units, then they shall resolve such disputes using the dispute resolution process in Article XXVI. If, following such dispute resolution process, EPA and Ecology cannot agree, then the releases and units that are the subject of the dispute shall be considered a matter which Ecology, EPA, and DOE have chosen not to address under this Agreement, and all Parties reserve all rights and authorities with respect to such matters.

ARTICLE XXV. PHYSICALLY INCONSISTENT ACTIONS

90. EPA and Ecology intend that neither regulatory agency shall direct actions to be taken at the Hanford Site that are physically inconsistent with other actions directed by either regulatory agency at the Site. This provision applies to any actions required to be taken at the site under RCRA or CERCLA. For the purposes of this Agreement, Physically Inconsistent Action shall mean any action which, if implemented, would reduce the overall effectiveness of other response actions. The setting of priorities for action based on budgetary considerations shall not be used as a factor in determining the presence of physical inconsistency. The provisions of this Article are independent of and do not modify or otherwise affect the provisions of Article XXVIII (RCRA/CERCLA Reservation of Rights).

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91. In the event of a dispute between EPA and Ecology over an issue of physical inconsistency, either Party may refer such dispute to the dispute resolution process at Article XXVI. In resolving a dispute concerning a possible physical inconsistency, the project managers, the Dispute Resolution Committee and the Senior Executive Committee shall attempt to resolve the dispute in such a way as to promote timely cleanup and benefit to the net overall environmental quality of the Hanford Site.

If at the conclusion of that dispute resolution process, the Parties have not agreed on a resolution of the dispute, then the releases and activities that are the subject of the dispute shall be considered a matter which the Parties have chosen not to address under this Agreement, and the Parties reserve all rights and authorities with respect to such matters.

#### **ARTICLE XXVI. DISPUTE RESOLUTION**

92. Resolution of Dispute between Ecology and EPA under this Part Four shall be resolved in the following manner:

(1) On discovery of any dispute between Ecology and EPA under this Part Four, each regulatory agency's unit and/or project managers shall make reasonable efforts to informally resolve such disputes. If informal resolution cannot be achieved, the disputing Party shall submit a written statement of dispute setting forth the nature of the dispute, the disputing Party's position with respect to the dispute, and the information relied upon to support its position to the Dispute Resolution Committee (DRC) as described below. Receipt of such a statement by the DRC shall constitute formal elevation of the dispute in question to the DRC. At such time as the disputing Party submits a statement of dispute to the DRC, a copy shall be sent to DOE. The DRC will serve as a forum for resolution of disputes for

which agreement has not been reached through informal dispute resolution. Ecology and EPA agree to utilize the dispute resolution process only in good faith and agree to expedite, to the extent possible, the dispute resolution process whenever it is used.

(2) The Ecology designated member of the DRC is the Assistant Director for Waste Management. EPA's designated member of the DRC is the Hazardous Waste Division Director of EPA's Region 10. Following elevation of a dispute to the DRC, the DRC shall have 21 days to unanimously resolve the dispute. Any successful resolution shall be documented within an additional 21 days by a jointly signed determination outlining the resolution reached. At such time, a copy of such documentation shall be sent to DOE. If the DRC is unable to unanimously agree on a resolution, the members shall forward pertinent information and their respective recommendations to the Senior Executive Committee (SEC) for resolution.

(3) The Ecology designated member of the SEC is its Director. EPA's designated member of the SEC is the Regional Administrator of EPA Region 10. The SEC will serve as the forum for resolution of disputes for which agreement has not been reached by the DRC. The SEC members shall, as appropriate, confer, meet and exert their best efforts to resolve the dispute. The DOE-RL Operations Manager shall meet with the SEC to assist in resolving the dispute. The SEC shall have 21 days to unanimously resolve the dispute. Any successful resolution shall be documented, within an additional 21-days, by a jointly signed determination outlining the resolution reached. At such time, a copy of such documentation shall be sent to DOE.

(4) Throughout the above dispute resolution process, EPA and Ecology shall consult, as appropriate, with DOE in order to facilitate resolution of disputes.

93. If disputes are not resolved pursuant to this Article, such disputes shall be subject to Article XXVIII.

94. The pendency of any dispute under this Part shall not affect DOE's responsibility for timely performance of the work required by this Agreement, except that the time period for completion of work directly affected by such dispute shall be extended for a period of time usually not to exceed the actual time taken to resolve any good faith dispute in accordance with the procedures specified herein. All elements of the work required by this Agreement which are not directly affected by the dispute shall continue and be completed in accordance with this Agreement.

**ARTICLE XXVII. OTHER DISPUTES AND EPA OVERSIGHT**

95. If there are other disputes between Ecology and EPA concerning overlaps between Part Two and Part Three of this Agreement, Ecology and EPA shall use the dispute resolution process in Article XXVI to resolve such disputes.

96. The provisions of this Agreement do not eliminate EPA's responsibility for oversight of Ecology's exercise of its authorized RCRA authorities. In carrying out any such oversight, EPA shall follow the statutory and regulatory procedures for such oversight and the provisions of this Agreement, including, as appropriate, the Dispute Resolution process in Article XXVI.

**ARTICLE XXVIII. RCRA/CERCLA RESERVATION OF RIGHTS**

97. If EPA and Ecology are unable to resolve jointly any dispute arising under this Part, then each regulatory agency reserves its rights to impose its requirements directly on DOE, to defend the basis for those

requirements, and to challenge the other regulatory agency's conflicting requirements. In such event, DOE reserves its right to raise any defenses available.

98. EPA and Ecology each reserve its right after utilizing the Dispute Resolution process in Part Four, to seek judicial review of a proposed decision or action taken with respect to corrective or remedial actions at any given operable unit on the grounds that either EPA or Ecology claims that such proposed decision or action conflicts with its respective laws governing protection of human health and/or the environment. It is the understanding of the Parties that this reservation is intended to provide for challenges where the adequacy of protection of human health and the environment or the means of achieving such protection is at issue.



## PART FIVE

### COMMON PROVISIONS

#### ARTICLE XXIX. RECOVERY OF STATE COSTS

99. DOE agrees to reimburse Ecology for all of its costs related to the implementation of this Agreement as provided below:

##### A. Reimbursement of Department of Ecology RCRA Costs:

1. DOE agrees to pay to the appropriate account of the Treasury of the State of Washington, all reasonable fees and other service charges which would be payable by any person managing hazardous and/or radioactive mixed waste under applicable Washington law, including the mixed waste management fee assessed pursuant to RCW 70.105.280 and chapter 173-328 WAC. Program elements or activities for which the mixed waste management fee may be assessed include (a) office, staff, and staff support for the purposes of facility or unit permit development, review, and issuance, and (b) actions taken to determine and ensure compliance with the state's hazardous waste management act, as detailed in WAC 173-328-040. In the event DOE disputes any fees or service charges by Ecology, DOE may contest the disputed fees or service charges in accordance with the appeal procedures provided under applicable law.

2. Ecology shall provide DOE-RL by June 15 of each year a preliminary billing statement reflecting the fee to be assessed to DOE-RL for the upcoming twelve-month period, by quarter, beginning July 1. Ecology shall, prior to September 15, notify DOE-RL of actual adjustments arising from the previous twelve-month period's cost performance against amounts paid by DOE-RL in response to the previous October's billing statement. Ecology shall

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after October 1 send DOE-RL a final billing statement which identifies the mixed waste management fee costs assessed to DOE-RL for the twelve-month period beginning the previous July 1. This statement shall be accompanied by an itemization of changes from the preliminary statement sent prior to June 15. DOE-RL shall promptly pay this billing.

3. Ecology shall by January 31 of each year provide DOE-RL a forecast of planned waste management fees chargeable to DOE-RL. The forecasts shall be annual projections for a period of seven federal fiscal years beginning the previous October 1. Such forecasts shall include supporting information which explains significant annual changes in proposed funding requirements. The Parties acknowledge that these forecasts are estimates and that actual fees may differ from the forecasts.

B. Reimbursement of Department of Ecology CERCLA Costs:

1. DOE agrees to reimburse Ecology for its CERCLA costs directly related to implementation of this Agreement up to the amount authorized through a yearly grant by DOE to Ecology.

2. By July 1, Ecology shall submit to DOE a proposed workscope and estimates of cost to be incurred relating to CERCLA work to be performed under this Agreement by Ecology for the upcoming period October 1 to September 30. DOE shall respond, in writing, with questions regarding this proposal, no later than August 1. The two Parties shall work diligently toward completion of grant negotiations leading to placement of award by October 1. DOE shall award grant funds to Ecology for the upcoming budget period from October 1, to September 30, in the amount consistent with the negotiated funding. In the event of delay in congressional appropriation and Continuing Resolution, funding under this grant shall be in incremental amounts. Initial funding of 70 percent of the negotiated amount for the grant period will be provided upon

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receipt of an OMB funding allotment. Total approved funding shall be provided to Ecology within 30 days after receipt by DOE-RL of the final Financial Status Report from Ecology for the previous grant period. All CERCLA costs incurred by Ecology shall be costs directly related to this Agreement and costs not inconsistent with CERCLA and the NCP.

3. In the event that DOE contends that any costs incurred were not directly related to the implementation of this Agreement or were incurred in a manner inconsistent with CERCLA or the NCP, DOE may challenge the costs allowable under the grant to Ecology. If unresolved, Ecology's demand, and DOE's challenge, may be resolved through the appeals procedures set forth in 10 C.F.R. Part 600 and 10 C.F.R. Part 1024.

4. DOE shall not be responsible for reimbursing Ecology for any costs actually incurred in excess of the amount authorized each budget period in the grant award.

5. Ecology shall by January 31 of each year provide DOE-RL a forecast of planned CERCLA grant funding requirements. The forecasts shall be annual projections for a period of seven federal fiscal years beginning the previous October 1. Such forecasts shall include supporting information which explains significant annual changes in proposed funding requirements. The Parties acknowledge that these forecasts are estimates, and that actual grant requests may differ from the forecasts.

C. Reimbursement of other Department of Ecology Costs:

1. DOE agrees to pay justifiable costs incurred by Ecology in the implementation of this Agreement which are not covered by payments made pursuant to subparagraphs A and B above.

2. For such costs that may be recouped through the assessment of a fee, other than a mixed waste fee, DOE agrees to pay the fee assessed in the time permitted by law. In the event DOE disputes any fees assessed by Ecology, DOE may contest the disputed fees in accordance with the appeal procedures provided under applicable law.

3. For costs such as those costs related to Public Involvement, Emergency Preparedness Planning and oversight of Environmental Monitoring that may not be recouped through the assessment of a fee, DOE agrees to reimburse Ecology through a yearly grant. On an annual basis, Ecology shall submit to DOE a proposed cost estimate for work and services, not otherwise covered by subparagraphs A, or B, above, to be performed by the State in the implementation of this Agreement during the upcoming federal fiscal year. Subsequent to review by DOE, DOE shall issue funds to Ecology in an amount consistent with the estimated approved workscope and costs.

4. Ecology shall by January 31 of each year provide DOE-RL a forecast of planned funding requirements for other grants or fees not identified in subparagraphs A and B above. The forecasts shall be in the form of annual projections for a period of seven federal fiscal years beginning the previous October 1. Such forecasts shall include supporting information which explains significant annual changes in proposed funding requirements.

D. Report, Records, and Accounts:

1. Ecology agrees to keep records and books of account, in accordance with generally accepted accounting principles and practices, covering DOE's payment of funds and Ecology's use of such funds under subparagraphs B and C.3 above.

2. Ecology will provide to DOE within 30 days after the end of each quarter and 90 days after the end of each state fiscal year, a Financial Status Report (SF 269, short form) showing the expenditure of DOE funds provided pursuant to subparagraphs B and C.3 above.

3. DOE shall at all reasonable times be afforded access to books and records and to related correspondence, receipts, voucher, memoranda, and other data reflecting the use of DOE funds provided pursuant to subparagraphs B and C.3 above. Ecology shall preserve such books and papers in accordance with the retention requirements referenced in subparagraph D.4 below.

4. The Comptroller General of the United States or any of his or her duly authorized representatives shall, until the expiration of 3 years after the payment of funds pursuant to subparagraphs B or C.3 above, have access to and the right to examine any directly pertinent books, documents, papers, and records of the State involving transactions covered by subparagraphs B or C.3 above.

5. Expenditures of funds received pursuant to subparagraphs B or C.3 above are subject to the requirements of the Single Audit Act of 1984 (P.L. 98-502) and Office of Management and Budget Circular A-128 (Audits of State and Local Governments).

6. Nothing herein shall be deemed to preclude an audit by the General Accounting Office of any funds received pursuant to subparagraph B or C.3 above.

100. Ecology's performance of its obligations under this Agreement shall be excused if its justifiable costs are not paid as required by this Article.

ARTICLE XXX. ADDITIONAL WORK OR MODIFICATION TO WORK

101. In the event that additional work, or modification to work, including remedial investigatory work and/or engineering evaluation, is necessary to accomplish the objectives of this Agreement, notification and description to such additional work or modification to work shall be provided to DOE. DOE will evaluate the request and notify the requesting Party within thirty (30) days of receipt of such request of its intent and ability to perform such work, including the impact such additional work will have on budgets and schedules. If DOE does not agree that such additional work is required by this Agreement or if DOE asserts such additional work is otherwise inappropriate, the matter shall be resolved in accordance with the Dispute Resolution procedures of Part Two or Part Three of this Agreement, as appropriate. Field modifications, as set forth in the Action Plan, are not subject to this Article. Extensions of schedules may be provided pursuant to Article XL (Extensions).

102. Any additional work or modification to work determined to be necessary by DOE shall be proposed to the Lead Regulatory Agency by DOE and will be subject to review in accordance with the appropriate Dispute Resolution procedures of Part Two or Part Three of this Agreement, as appropriate, prior to initiation.

103. If any additional work or modification to work will adversely affect work schedules or will require significant revisions to an approved schedule, the EPA and Ecology Project Managers shall be immediately notified of the situation followed by a written explanation within seven (7) days of the initial notification. Requests for extensions of schedule(s) shall be evaluated in accordance with Article XL (Extensions).

ARTICLE XXXI. QUALITY ASSURANCE

104. All response work performed pursuant to this Agreement shall be done under the direction and supervision or in consultation with, as necessary, a qualified engineer, hydrogeologist, or other expert, with experience and expertise in hazardous waste management, hazardous waste site investigation, cleanup, and monitoring.

105. Throughout all sample collection, preservation, transportation, and analyses activities required to implement this Agreement, DOE shall use procedures for quality assurance, and for quality control, in accordance with approved EPA methods, including subsequent amendments to such procedures. The DOE shall comply with the "Data Quality Strategy for Hanford Site Characterization" (as listed in Appendix F of the Action Plan) and Sections 6.5 and 7.8 of the Action Plan. For special circumstances, other procedures approved by the lead regulatory agency may be used. The DOE shall use methods and analytical protocols for the parameters of concern in the media of interest within detection and quantification limits in accordance with both QA/QC procedures and data quality objectives approved in the work plan, RCRA closure plan or RCRA permit. The EPA or Ecology may require that DOE submit detailed information to demonstrate that any of its laboratories are qualified to conduct the work. The DOE shall assure that EPA and Ecology (including contractor personnel) have access to laboratory personnel, equipment and records related to sample collection, transportation, and analysis.

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ARTICLE XXXII. CREATION OF DANGER

106. If any Party determines that activities conducted pursuant to this Agreement are creating a danger to the health or welfare of the people on the Hanford Site or in the surrounding area or to the environment, that Party may require or order the work to stop. Any such work stoppage or stop work order shall be expeditiously reviewed by all Parties after its initiation. Any dispute or nonconcurrence shall be immediately referred to the DRC level of the appropriate Dispute Resolution process.

107. If the other Parties concur in the work stoppage, DOE's obligations shall be suspended and the time periods for performance of that work, as well as the time period for any other work dependent upon the work which was stopped, shall be extended, pursuant to Article XL (Extensions) of this Agreement, for such period of time equivalent to the time in which work was stopped, or as agreed to by the Parties.

ARTICLE XXXIII. NOTIFICATION

108. Unless otherwise specified, any report or submittal provided by DOE pursuant to a schedule or deadline identified in or developed under this Agreement (including the Action Plan) shall be sent by certified or overnight express mail, return receipt requested, or hand delivered as required to the addresses of the Ecology and EPA Project Managers as identified in Appendix E of the Action Plan.

109. Documents sent to the DOE by EPA or Ecology which require a response or activity by DOE pursuant to this Agreement shall be sent by certified or overnight express mail, return receipt requested, or hand delivered to the DOE Project Manager as identified in Appendix E of the Action Plan.



ARTICLE XXXIV. PROJECT MANAGERS

110. In Appendix E of the Action Plan, EPA, Ecology and DOE have each designated a Project Manager for the purpose of overseeing the implementation of this Agreement. Any Party may change its designated Project Manager by notifying the other Parties, in writing ten (10) days before the change, to the extent possible. To the maximum extent possible, communications between the Parties concerning the terms and conditions of this Agreement shall be directed through the Project Managers. Each Project Manager shall be responsible for assuring that all communication from the other Parties and Project Managers are appropriately disseminated to that responsible Project Manager's organization.

ARTICLE XXXV. SAMPLING AND DATA/DOCUMENT AVAILABILITY

111. The DOE shall transmit the results of laboratory analytical data and non-laboratory data collected pursuant to this Agreement to EPA and Ecology in an expeditious manner, as specified in Section 9.6 of the Action Plan.

112. DOE shall notify the EPA and Ecology not less than five (5) days in advance of any well drilling, sample collection, or other monitoring activity conducted pursuant to this Agreement.

ARTICLE XXXVI. RETENTION OF RECORDS

113. Each Party to this Agreement shall preserve for a minimum of ten (10) years after termination of this Agreement all of the records in its or its contractors possession related to sampling, analysis, investigations, and monitoring conducted in accordance with this Agreement. After this ten year period, DOE shall notify the EPA and Ecology at least forty-five (45)

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days prior to destruction or disposal of any such records. Upon request, the Parties shall make such records or true copies available, to the other Parties subject to Article XLV (Classified and Confidential Information).

114. DOE agrees it shall establish and maintain an administrative record at or near Hanford in accordance with CERCLA Sec. 113(k). The administrative record shall be established and maintained in accordance with current and future EPA policy and guidelines. A copy of each document placed in the administrative record will be provided to EPA and Ecology.

#### ARTICLE XXXVII. ACCESS

115. Without limitation on any authority conferred on either agency by law, EPA, Ecology and/or their Authorized Representatives, shall have authority to enter the Hanford Site at all reasonable time for the purposes of, among other things: (1) inspecting records, operating logs, contracts and other documents relevant to implementation of this Agreement, subject to Article XLV (Classified and Confidential Information); (2) reviewing the progress of DOE or its response action contractors in implementing this Agreement; (3) conducting such tests as the Ecology and the EPA Project Managers deem necessary; and (4) verifying the data submitted to EPA and Ecology by DOE. DOE shall honor all requests for access by EPA and Ecology, conditioned only upon presentation of proper credentials, conformance with Hanford Site safety and security requirement, and shall be conducted in a manner minimizing interference with any operations at Hanford. Any denial of consent to access must be justified in writing within fourteen (14) days of such denial, and arrangements shall be made for access to the facility or area

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in question as soon as practicable. DOE reserves the right to require EPA and Ecology personnel or representatives to be accompanied by an escort while on the Hanford Site. Escorts shall be provided in a timely manner.

116. To the extent that this Agreement requires access to property not owned and controlled by DOE, DOE shall exercise its authorities to obtain access pursuant to Section 104(e) of CERCLA. DOE shall use its best efforts to obtain signed access agreements for itself, its contractors and agents, and EPA and Ecology and their contractors and agents, from the present owners or lessees in advance of the date such activities are scheduled to commence. DOE shall provide EPA and Ecology with copies of such agreements. With respect to non-DOE property upon which monitoring wells, pumping wells, treatment facilities, or other response actions are to be located, DOE shall use its best efforts to obtain access agreements that: provide that no conveyance of title, easement, or other interest in the property shall be consummated without provisions for the continued operation of such wells, treatment facilities, or other response actions on the property; and provide that the owners of any property where monitoring wells, pumping wells, treatment facilities or other response actions are located shall notify DOE, Ecology, and EPA by certified mail, at least thirty (30) days prior to any conveyance, of the property owner's intent to convey any interest in the property and of the provisions made for the continued operation of the monitoring wells, treatment facilities, or other response actions installed pursuant to this Agreement.

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**ARTICLE XXXVIII. FIVE-YEAR REVIEW**

117. Consistent with CERCLA Sec. 121(c), and in accordance with this Agreement, DOE agrees that EPA may review remedial action(s) for Operable Unit(s) that allow hazardous substances, pollutants or contaminants to remain on-site, no less often than every five (5) years after the initiation of the final remedial action for such Operable Unit to assure that human health and the environment are being protected by the remedial action being implemented. If upon such review it is the judgement of EPA, after consultation with Ecology, that additional action or modification of the remedial action is appropriate in accordance with CERCLA Sec. 104 or 106, EPA and Ecology may require DOE to implement such additional or modified work pursuant to Article XXX (Additional Work).

**ARTICLE XXXIX. AMENDMENT OF AGREEMENT**

118. This Agreement may be amended by unanimous agreement of DOE, Ecology and EPA. Any such amendment shall be in writing, shall have as the effective date that date on which it is signed by all the Parties, and shall be incorporated into this Agreement by reference. Procedures for modifying or amending the Action Plan are contained in Sections 11 and 12 of the Action Plan.

**ARTICLE XL. EXTENSIONS**

119. Either a timetable and deadline or a schedule shall be extended upon receipt of a timely request for extension and when good cause exists for the requested extension. Any DOE request for extension shall be submitted in writing and shall specify:

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A. The timetable and deadline or schedule for which the extension is sought;

B. The length of the extension sought;

C. The good cause for the extension; and

D. Any related timetable and deadline or schedule that would be affected if the extension were granted.

120. Good cause exists for an extension when sought in regard to:

A. An event of force majeure as defined in Article XLVII (Force Majeure), subject to Ecology's reservation in Paragraph 147.

B. A delay caused by another Party's failure to meet any requirement of this Agreement;

C. A delay caused by the invocation of Dispute Resolution to the extent provided by paragraph 30(F) and paragraph 59(I) or judicial order.

D. A delay caused, or which is likely to be caused, by the grant of an extension in regard to another timetable and deadline or schedule; and

E. Any other event or series of events mutually agreed to by the Parties as constituting good cause.

121. Absent agreement of the Parties with respect to the existence of good cause, DOE may seek and obtain a determination through the Dispute Resolution process that good cause exists.

122. Within fourteen (14) days of receipt of a request for an extension of a timetable and deadline or a schedule, or as otherwise agreed to by the parties in writing, each Party shall advise DOE in writing of its respective position on the request. Any failure of a Party to respond within the fourteen (14) day period (or other period agreed to in writing) shall be

deemed to constitute concurrence in the request for extension. If a Party does not concur in the requested extension, it shall include in its statement of nonconcurrence an explanation of the basis for its position.

123. If there is consensus among the Parties that the requested extension is warranted, DOE shall extend the affected timetable and deadline or schedule accordingly. If there is no consensus among the Parties as to whether all or part of the requested extension is warranted, the timetable and deadline or schedule shall not be extended except in accordance with the determination resulting from the Dispute Resolution process.

124. Within seven (7) days of receipt of one or more statements of nonconcurrence with the requested extension, or such other time period as agreed to by the parties in writing, DOE may invoke the Dispute Resolution process.

125. A timely and good faith request for an extension shall toll any assessment of stipulated penalties pursuant to Article XX (Stipulated Penalties) or any application for judicial enforcement of the affected timetable and deadline or schedule until a decision is reached on whether the requested extension will be approved. If Dispute Resolution is invoked and the requested extension is denied, stipulated penalties pursuant to Article XX (Stipulated Penalties) may be assessed and may accrue from the date of the original timetable, deadline or schedule. Following the grant of an extension, an assessment of stipulated penalties pursuant to Article XX (Stipulated Penalties) or an application for judicial enforcement may be sought only to compel compliance with the timetable and deadline or schedule as most recently extended.

**ARTICLE XLI. CONVEYANCE OF TITLE**

126. No conveyance of title, easement or other interest in the Hanford Site on which any containment system, treatment system, monitoring system or other response action(s) is installed or implemented pursuant to this Agreement shall be consummated by DOE without provision for continued maintenance of any such system or other response action(s). At least thirty (30) days prior to any conveyance, DOE shall notify EPA and Ecology of the provisions made for the continued operation and maintenance of any response action(s) or system installed or implemented pursuant to this Agreement.

**ARTICLE XLII. PUBLIC PARTICIPATION**

127. The Parties agree that this Agreement and any subsequent proposed remedial action alternative(s) and subsequent plan(s) for remedial or corrective action or permitting/closure action at the Hanford Site arising out of this Agreement shall comply with the administrative record and, public participation requirements of CERCLA, including CERCLA Secs. 117 and 113(k), the NCP, and EPA guidance on public participation and administrative records, or the public participation requirements of RCRA and Ch. 70.105 RCW.

128. DOE shall develop and implement a Community Relations Plan ("CRP") which responds to the need for an interactive relationship with all interested community elements, both on and off Hanford, regarding activities and elements of work undertaken by DOE under this Agreement. DOE agrees to develop and implement the CRP in a manner consistent with CERCLA Sec. 117, the NCP, EPA guidelines set forth in EPA's Community Relations Handbook, and any modifications thereto, and the public participation requirements of RCRA and Ch. 70.105 RCW. The CRP is subject to the review and approval by EPA and Ecology under Article XV (Review of Documents).

129. The public participation requirements of this Agreement shall be implemented so as to meet the public participation requirements applicable to RCRA permits under 40 C.F.R. Part 124 and RCRA Sec. 7004.

**ARTICLE XLIII. DURATION/TERMINATION**

130. Upon satisfactory completion of the remedial or corrective action phase as described in Section 7 of the Action Plan for a given Operable Unit, the Lead Regulatory Agency shall issue a Notice of Completion to DOE for that Operable Unit. At the discretion of the Lead Regulatory Agency, a Notice of Completion may be issued for completion of a portion of the remedial or corrective action for an Operable Unit.

131. This Agreement shall terminate when DOE has satisfactorily completed all work pursuant to this Agreement and the Action Plan or when the Parties unanimously agree to termination.

132. The Parties agree that due to the long-term commitments contained in this Agreement, this Agreement will be reviewed by the Parties five (5) years from the date of execution of this Agreement, and at the conclusion of every five (5) year period thereafter. The purpose of this review will be to determine (1) whether there has been substantial compliance with the terms of the Agreement and, (2) the need to modify the Agreement. This review will be made by a committee composed of representatives from each Party. Amendments to the Agreement will be made in accordance with Article XXXIX (Amendment of Agreement). If the Parties do not unanimously agree that there has been substantial compliance with the terms of the Agreement, EPA and Ecology reserve the right to withdraw from the Agreement; provided, however, that all Parties shall comply with all provisions of this Agreement from the effective date of the Agreement to the date of the



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withdrawal. Further provided, however, that no Party may base its withdrawal from this Agreement on its own substantial noncompliance with this Agreement. Regardless of any Party's withdrawal under this paragraph, all parties shall comply with all provisions of this Agreement as they relate to operable units where a remedial investigation or RCRA facility investigation workplan has already been approved, unless the Parties agree otherwise. Any Party withdrawing from this Agreement shall notify the other Parties in writing.

#### ARTICLE XLIV. SEVERABILITY

133. If any provision of this Agreement is ruled invalid, illegal or unconstitutional, the remainder of the Agreement shall not be affected by such ruling.

#### ARTICLE XLV. CLASSIFIED AND CONFIDENTIAL INFORMATION

134. Notwithstanding any provision of this Agreement, all requirements of the Atomic Energy Act of 1954, as amended, and all Executive Orders concerning the handling of unclassified controlled nuclear information, restricted data and national security information, including "need to know" requirements, shall be applicable to any access to information or facilities covered under the provisions of this Agreement. EPA and Ecology reserve their right to seek to otherwise obtain access to such information or facilities when it is denied, in accordance with applicable law.

135. Any Party may assert on its own behalf or on behalf of a contractor, subcontractor or consultant, a business confidentiality claim or privilege covering all or any part of the information requested by this Agreement, pursuant to 42 U.S.C. Sec. 9604 and state law. Analytical data shall not be claimed as business confidential. Parties are not required to

provide legally privileged information. At the time any information is furnished which is claimed to be business confidential, all Parties shall afford it the maximum protection allowed by law. If no claim of business confidentiality accompanies the information, it may be made available to the public without further notice.

#### ARTICLE XLVI. RESERVATION OF RIGHTS

136. The Parties have determined that the activities to be performed under this Agreement are in the public interest. EPA and Ecology agree that compliance with this Agreement shall stand in lieu of any administrative and judicial remedies against DOE and its contractors, which are available to EPA and Ecology regarding the currently known release or threatened release of hazardous substances, hazardous wastes, pollutants or contaminants at the Hanford Site which are the subject of the activities being performed by DOE under Articles VII (Work) and XIV (Work). Provided, that nothing in this Agreement, except as provided in paragraphs 38 and 80 on stipulated penalties, shall preclude EPA or Ecology from the direct exercise of (without employing dispute resolution) any administrative or judicial remedies available to them under the following circumstances:

A. In the event or upon the discovery of a violation of, or noncompliance with this Agreement, or any provision of CERCLA, RCRA or Ch. 70.105 RCW, not addressed by this Agreement.

B. Any discharge or release of hazardous waste which the Parties choose not to address under this Agreement.

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C. Upon discovery of new information regarding hazardous substances or hazardous waste management, including but not limited to, information regarding releases of hazardous waste or hazardous substances to the environment which the Parties choose not to address under this Agreement.

D. Upon Ecology's or EPA's determination that action beyond the terms of this Agreement is necessary to abate an imminent and substantial endangerment to the public health or welfare or the environment.

137. In the event of any action by EPA or Ecology under Paragraph 136 to address matters not covered in this Agreement, DOE reserves all rights and defenses available under law. In the event of any action by EPA or Ecology under Paragraph 136 to address matters covered in this Agreement, DOE reserves all rights and defenses specified in this Agreement.

138. Except as otherwise expressly provided herein, nothing in this Agreement shall constitute or be construed as a bar or release from any claim, cause of action or demand in law or equity by or against any person, firm, partnership or corporation not a signatory to this Agreement for any liability it may have arising out of or relating in any way to this Agreement or the generation, storage, treatment, handling, transportation, release, or disposal of any hazardous substances, hazardous wastes, hazardous constituents, pollutants, or contaminants found at, taken to, or taken from the Hanford Site.

139. If EPA and Ecology are in dispute concerning any matter addressed in Part Four, and are unable to resolve such dispute after pursuing dispute resolution pursuant to the dispute resolution procedures set forth in Part Four, the releases or actions which are the subject of the dispute shall be deemed matters which are not addressed under this Agreement. Thereafter, EPA, Ecology, and DOE may take any action with regard to such matters which

would be appropriate in the absence of this Agreement, and each party reserves its rights to assert and defend its respective legal position in connection with any such actions.

140. EPA and Ecology shall not be held as a Party to any contract entered into by DOE to implement the requirements of this Agreement.

141. For matters within the scope of this Agreement, Ecology, and EPA reserve the right to bring any enforcement action against DOE's contractors, subcontractors and/or operators, if DOE fails to comply with this Agreement. For matters outside the scope of this Agreement, Ecology and EPA reserve the right to bring any enforcement action against DOE's contractors, subcontractors and/or operators, regardless of DOE's compliance with this Agreement.

142. This Agreement shall not be construed to limit in any way the right provided by law to the public or any citizen to obtain information about the work to be performed under this Agreement or to sue or intervene in any action to enforce state or federal law.

143. Except as provided herein, DOE is not released from any liability which it may have pursuant to any provisions of state and federal law, including any claim for damages for liability to destruction of, or loss of natural resources.

144. This Agreement shall not restrict EPA and/or Ecology from taking any legal or response action for any matter not specifically part of the work covered by this Agreement.

ARTICLE XLVII. FORCE MAJEURE

145. A Force Majeure shall mean any event arising from causes beyond the control of a Party that causes a delay in or prevents the performance of any obligation under this Agreement, including, but not limited to:

A. acts of God, fire, war, insurrection, civil disturbance, or explosion;

B. unanticipated breakage or accident to machinery, equipment or lines of pipe despite reasonably diligent maintenance;

C. adverse weather conditions that could not be reasonably anticipated, or unusual delay in transportation;

D. restraint by court order or order of public authority;

E. inability to obtain, at reasonable cost and after exercise of reasonable diligence, any necessary authorizations, approvals, permits or licenses due to action or inaction of any governmental agency or authority other than DOE;

F. delays caused by compliance with applicable statutes or regulations governing contracting, procurement or acquisition procedures, despite the exercise of reasonable diligence; and

G. insufficient availability of appropriated funds, if DOE shall have made timely request for such funds as part of the budgetary process as set forth in Article XLVIII (Cost, Schedule, and Scope Planning and Reporting) of this Agreement.

146. A Force Majeure shall also include any strike or other labor dispute, whether or not within the control of the Parties affected thereby. Force Majeure shall not include increased cost or expenses of response actions, whether or not anticipated at the time such response actions were initiated.

147. DOE and Ecology agree that Subparagraph B (entirely), Subparagraph C ("delay in transportation"), Subparagraph D ("order of public authority"), Subparagraph E ("at reasonable cost"), and Subparagraph G (entirely), of Paragraph 145 do not create any presumptions that such events arise from causes beyond the control of a Party. Ecology specifically reserves the right to withhold its concurrence to any extensions which are based on such events pursuant to the terms of Article XL (Extensions), or to contend that such events do not constitute Force Majeure in any action to enforce this Agreement.

**ARTICLE XLVIII. COST, SCHEDULE, AND SCOPE PLANNING AND REPORTING**

148. DOE shall take all necessary steps to obtain timely funding in order to fully meet its obligations under this Agreement. This shall be accomplished in the following manner:

A. In its annual budget request, DOE shall include estimated funding levels required to achieve full compliance with this Agreement.

B. In the process of formulating its annual budget request, DOE may be subject to target funding guidance directed by the Office of Management and Budget (OMB). When DOE's target budget case differs from its full compliance funding case, the Parties agree to attempt to reach agreement regarding workscope, priorities, schedules/milestones, and Activity Data Sheet (ADS) funding levels required to accomplish the purpose of the Agreement, provided satisfactory progress has been made in controlling costs in accordance with the cost efficiency initiatives. These discussions shall be conducted before DOE-RL submits its annual budget request and supporting ADSs to DOE Headquarters (DOE-HQ) under signature of the DOE-RL manager.

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C. DOE-RL will submit its budget request with detailed ADSs, identifying both target and compliance funding levels, to DOE-HQ and identify any unresolved issues raised by Ecology and EPA. If these issues are not subsequently resolved prior to DOE's submission of its budget request to OMB, DOE-HQ will also identify these issues and the funding required for compliance to OMB.

D. In determining the workscope, priorities, and schedules, the Parties shall consider the values expressed by the Hanford stakeholders.

E. The Parties recognize that successful implementation of this Agreement is dependent upon the prudent use of resources, and that resource requirements and constraints should be considered during the work planning, budget formulation, and budget execution process. To ensure the development of responsible budget requests, consistent with the requirements of this Agreement and applicable federal/state statutes, the Parties will work cooperatively and in good faith.

149. The purpose of this paragraph is to establish a mechanism that will help assure adequate progress toward meeting the requirements of this Agreement. It provides for communication and consultation on work scope, priorities, schedules/milestones, and cost/funding matters. It further provides a means for performance measurement and for early identification of problems which could jeopardize compliance with the schedules and milestones of the Agreement.

A. Within two weeks after DOE Headquarters (DOE-HQ) issuance of Environmental Management planning and/or budget guidance, including target level funding guidance, to the Richland Operations Office (DOE-RL), DOE-RL shall provide a copy of it to Ecology and EPA along with a preliminary

assessment of its impacts. DOE-RL shall also provide a copy of its initial contractor budget guidance to Ecology and EPA within two weeks after issuance.

B. EPA and Ecology agree not to release confidential budget information to any other entities prior to submission by the President of his budget request to Congress, unless authorized by DOE or required to do so by court order. DOE shall seek to intervene in any proceeding brought to compel or enjoin the release of this information. If allowed to intervene, DOE shall assert its interest in, and the legal basis for, maintaining the confidentiality of this information.

C. As soon as possible after DOE-HQ issuance of its initial planning guidance but no later than two weeks prior to DOE-RL's submission of its budget request and supporting Activity Data Sheets to DOE-HQ, Ecology and EPA shall be given: 1) a management level briefing at the ADS level on the budget, including an assessment of impacts on the requirements of this Agreement; and 2) the opportunity to review, comment and make recommendations on that budget request, including workscope, priorities, schedules/milestones, and five year target and compliance cost/funding projections. DOE-RL shall, to the extent it deems appropriate, revise its budget request and ADSs, including workscope, to address or resolve Ecology and EPA comments prior to transmittal to DOE-HQ. DOE-RL shall notify DOE-HQ in its budget request of any comments not fully resolved to the satisfaction of all Parties, and shall identify full compliance funding levels.

D. Within 30 days after the President's submission of the budget to Congress, DOE-RL shall brief Ecology and EPA on the President's budget request at the ADS level detail. At this briefing, DOE-RL shall notify Ecology and EPA of any differences between the target and compliance case workscope and cost/funding levels submitted in accordance with subparagraph C. above, and



the actual workscope and funding levels included in the President's budget request to Congress. DOE-RL shall also provide Ecology and EPA its assessment of the impacts such differences may have on DOE's ability to meet milestones or satisfy other requirements of this Agreement.

E. DOE shall notify and discuss with Ecology and EPA, prior to transmittal to OMB, any budget amendment, supplemental appropriation request or reprogramming request and any corresponding impacts upon the workscope and schedules, and DOE's ability to meet milestones or other requirements of this Agreement with and without the amendment, supplemental appropriation or reprogramming request.

F. Within 30 days after congressional budget appropriation, DOE-RL shall brief Ecology and EPA on the budget appropriation and subsequent funding allocations for the new fiscal year at ADS level detail. If there is a delay in congressional appropriation after the start of the fiscal year, DOE-RL shall inform Ecology and EPA of any congressional continuing resolution action, and the potential impacts, if any, on progress to achieve milestones and other requirements of the Agreement. Ecology and EPA will be given timely opportunity to review and comment on these budget appropriation and funding allocation actions, and to make recommendations for reallocation of available funds.

G. If the Congressional budget appropriation differs from the funding levels required to comply with any milestones or other requirements of the Agreement, DOE-RL shall take whatever action is appropriate under the Agreement. Such action may include submitting a change request in accordance with the Action Plan, Section 12.0 entitled Changes to Action Plan/Supporting Schedules. The Parties shall attempt to reach agreement on adjustments in workscope or milestones consistent with the Congressional appropriation which

will minimize impacts on the requirements of this Agreement. If agreement cannot be reached, Ecology and EPA reserve the right to take appropriate action as provided for in this Agreement.

H. Ecology, DOE, and EPA project managers shall meet periodically throughout the budget execution year to discuss the status of projects to be funded for the current fiscal year, and events that have affected, or may affect milestones or activity within such milestones.

I. In order to ensure continuing, effective and timely interface between DOE, Ecology and EPA regarding work scope planning/scheduling, budget/funding, current year performance status, milestone tracking, and notification of problem areas, DOE shall, unless otherwise agreed to, provide the following, or their equivalent, to EPA and Ecology:

1. Annual Multi-Year Program Plans, including ADS level funding projections, as soon as possible after their development;

2. Annual Fiscal Year Work Plans, including ADS level funding profiles, as soon as possible after start of each fiscal year;

3. The monthly Approved Funding Plan (AFP), at ADS level detail, within two weeks following the start of each month;

4. Monthly Site Management System reports shall be provided to EPA and Ecology to identify: any anticipated delays in meeting time schedules, the reason(s) for such delay and actions taken to prevent or mitigate the delay, and any potential problems that may result in a departure from the requirements and time schedules. In accomplishing this, the SMS reports shall, as a minimum, include for each program: monthly and cumulative budget, actual monthly and cumulative costs, performance measurement information including explanations of cost/schedule variances, progress in achievement of milestones, and notification of problems and program/project

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delays. The appropriate contractor program managers shall sign the monthly Site Management System report. The signature block shall contain the statement: "The information contained within this report is complete and accurate to the best of my knowledge." At the monthly milestone review meetings, the appropriate DOE program manager will provide DOE's assessment of milestone progress and the extent to which DOE agrees or disagrees with the preceeding month's SMS report. The assessment will be documented in meeting minutes signed by the three parties. With regard to these assessments, signature of the minutes by Ecology and EPA shall indicate only that the assessment information was provided by DOE. The monthly Site Management System report shall also be placed in the Public Information Repositories as identified in Section 10.2 of the Action Plan.

5. Upon request, EPA and Ecology shall be provided access to available information below the ADS level of detail.

J. During the budget execution year, DOE-RL shall notify Ecology and EPA of any proposed action to internally reallocate funding at ADS levels, if such an action significantly affects workscope and schedules.

K. Within 30 days following the completion of DOE's annual midyear management review (approximately April-May of each year), DOE-RL shall brief Ecology and EPA on any decisions that significantly affect milestones under this Agreement.

L. As soon as possible following the end of each federal fiscal year, DOE-RL shall provide to EPA and Ecology the fiscal year-end SMS report, and a summary briefing on the amount of funds that have been obligated and spent during the fiscal year ended and the work that has been performed. This summary shall include, at ADS level detail, actual versus planned expenditures for the fiscal year end; a summary of carryover amounts including those

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available for expenditures in the following budget execution year; and summaries/information explaining the extent of work planned versus work completed or performed during the year.

M. The three parties agree to inform and involve the public and stakeholders at key stages of budget formulation and execution consistent with the Interim Report of the Federal Facilities Environmental Restoration Dialogue Committee. The process for informing and involving the public and stakeholders will be developed and included in the TPA Community Relations Plan.

N. The participation by Ecology and EPA in DOE's planning and budget formulation and execution process shall not affect DOE's authority over its budgets and funding level submission.

150. In accordance with Section 120(e)(5)(B) of CERCLA, 42 U.S.C. Sec. 9620(e)(5)(B), DOE shall include in its annual report to Congress the specific cost estimates and budgetary proposals associated with the implementation of this Agreement.

151. If appropriated funds are not available to fulfill DOE's obligations under this Agreement, EPA and Ecology reserve the right to initiate any other action which would be appropriate absent this Agreement.

152. EPA and DOE agree that any requirement for the payment or obligation of funds, including stipulated penalties under Article XX (Stipulated Penalties) of this Agreement, by DOE established by the terms of this Agreement shall be subject to the availability of appropriated funds, and no provision herein shall be interpreted to require obligation or payment of funds in violation of the Anti-Deficiency Act, 31 U.S.C. Sec. 1341. In cases

where payment or obligation of funds would constitute a violation of the Anti-Deficiency Act, the dates established requiring the payment or obligation of such funds shall be appropriately adjusted.

153. If appropriated funds are not available to fulfill DOE's obligations under this Agreement, the Parties shall attempt to agree upon appropriate adjustments to the workscope or milestones which require the payment or obligation of such funds. If no agreement can be reached then Ecology and DOE agree that in any action by Ecology to enforce any provision of this Agreement, DOE may raise as a defense that its failure or delay was caused by the unavailability of appropriated funds. Ecology disagrees that lack of appropriations or funding is a valid defense. However, DOE and Ecology agree and stipulate that it is premature at this time to raise and adjudicate the existence of such a defense. Acceptance of this Paragraph 153 does not constitute a waiver by DOE that its obligations under this Agreement are subject to the provisions of the Anti-Deficiency Act, 31 U.S.C. Sec. 1341.

#### **ARTICLE XLIX. COMPLIANCE WITH APPLICABLE LAWS**

154. All actions required to be taken pursuant to this agreement shall be taken in accordance with the requirements of all applicable federal and state laws and regulations. All Parties acknowledge that such compliance may impact schedules to be performed under this Agreement. Extensions of schedules shall be provided in accordance with Article XL (Extensions).

155. In any judicial challenge arising under this Agreement the court shall apply the law in effect at the time of the challenge, including any amendments to RCRA or CERCLA enacted after entry of this agreement. Where the law governing this agreement has been amended or clarified, any provision

of this agreement which is inconsistent with such amendment or clarification shall be modified to conform to such change or clarification.

ARTICLE L. EFFECTIVE DATE

156. This Agreement is effective upon signature by all Parties.

ARTICLE LI. ATTACHMENT 1

Attachment 1 to this Agreement is a letter dated February 26, 1989, from Donald Carr, Acting Assistant Attorney General, Land and Natural Resources Division, U.S. Department of Justice, to Christine Gregoire, Director, Department of Ecology. This letter sets forth the Department of Justice's position on the enforceability of this Agreement.

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IT IS SO AGREED:

Each undersigned representative of a Party certifies that he or she is fully authorized to enter into this Agreement and to legally bind such Party to this Agreement.<sup>1</sup>

THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY:

THE UNITED STATES DEPARTMENT OF ENERGY:

THE WASHINGTON STATE DEPARTMENT OF ECOLOGY

<sup>1</sup>The Hanford Federal Facility Agreement and Consent Order signed May 15, 1989, was originally executed by: Robie G. Russel, Regional Administrator, Region 10, for the U.S. Environmental Protection Agency; Michael J. Lawrence, Manager, Richland Operations Office, for the U.S. Department of Energy; and, Christine O. Gregoire, Director, for the Washington State Department of Ecology.

The first amendment to the Agreement was signed in August 1990, by: Thomas P. Dunne, Acting Regional Administrator, Region 10, for the U.S. Environmental Protection Agency; Edward S. Goldberg, Acting for John D. Wagoner, Manager, Richland Operations Office, for the U.S. Department of Energy; and, Christine O. Gregoire, Director, for the Washington State Department of Ecology.

The second amendment to the Agreement was signed in September 1991, by: Dana A. Rasmussen, Regional Administrator, Region 10, for the U.S. Environmental Protection Agency; John D. Wagoner, Manager, Richland Operations Office, for the U.S. Department of Energy; and Christine O. Gregoire, Director, for the Washington State Department of Ecology.

The third amendment to the Agreement was signed in August 1992, by: Dana A. Rasmussen, Regional Administrator, Region 10, for the U.S. Environmental Protection Agency; John D. Wagoner, Manager, Richland Operations Office, for the U.S. Department of Energy; and Chuck Clarke, Director, for the Washington State Department of Ecology.

The fourth amendment to the Agreement was signed in January 1994, by: Gerald Emison, Acting Regional Administrator, Region 10, for the U.S. Environmental Protection Agency; John D. Wagoner, Manager, Richland Operations Office, for the U.S. Department of Energy; and Mary Riveland, Director, for the Washington State Department of Ecology.

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U.S. Department of Justice  
Land and Natural Resources Division

ATTACHMENT 1

Office of the Assistant Attorney General

Washington, D.C. 20530

February 26, 1989

Ms. Christine Gregoire  
Director, Washington State  
Department of Ecology  
MSPV-11  
Olympia, Washington 98504

Dear Ms. Gregoire:

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You have asked the Department of Justice to review certain provisions of the proposed agreement between the U.S. Department of Energy, U.S. Environmental Protection Agency, and the Washington State Department of Ecology with regard to the Hanford facility. We agree that DOE and EPA have the authority to enter into this agreement, and that the agreement is binding and enforceable, in accordance with Article I, paragraph 10 of Article II, Article IV, Article IX, Article XX, and Article XXVII of the agreement, by the State of Washington and any affected citizens. The CERCLA provisions of this agreement are enforceable pursuant to section 310 of CERCLA. The RCRA provisions of this agreement are enforceable pursuant to section 7002 of RCRA.

As with consent decrees, which establish a process for remedy selection but do not resolve all cleanup issues, the Hanford agreement establishes a process to address future cleanup issues. Also just like consent decrees, the Hanford agreement contains a dispute resolution mechanism as well as procedures for seeking judicial review of conflicts which may arise concerning future decisions.

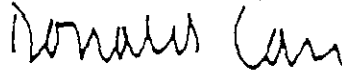
Accordingly, we believe that resolution of remediation and compliance problems at Hanford through such an agreement should be encouraged. In fact, we believe that the agreement is a superior vehicle for resolving DOE's cleanup and compliance obligations and therefore should be favored over more time-consuming litigation. The agreement has the advantage of being enforceable by any "person", whereas a consent decree is generally enforceable only by the parties to the litigation. Furthermore, the agreement allows for a more comprehensive resolution than a consent decree, since the latter must be very

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narrowly tailored to meet concerns over jurisdiction and precedent. Therefore, we support your efforts to resolve environmental concerns at Hanford through the use of such this agreement.

Recognizing the concerns that the state has raised with respect to the enforceability of this proposed agreement, I understand that this letter will be attached to the Hanford agreement.

Sincerely yours,



Donald A. Carr  
Acting Assistant Attorney General  
Land and Natural Resources Division

c: R. Russell  
M. Lawrence

ATTACHMENT 2

ACTION PLAN

FOR IMPLEMENTATION OF THE

HANFORD CONSENT ORDER AND COMPLIANCE AGREEMENT

BETWEEN

THE U.S. ENVIRONMENTAL PROTECTION AGENCY,

THE U.S. DEPARTMENT OF ENERGY,

AND

THE STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

AS AMENDED, SEPTEMBER 1990

SEPTEMBER 1991

AUGUST 1992

JANUARY 1994

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## CONTENTS

EXECUTIVE SUMMARY	1
1.0 INTRODUCTION	1-1
1.1 Purpose	1-1
1.2 Regulatory Authorities	1-1
1.3 Organization of Action Plan	1-3
2.0 MILESTONES	2-1
2.1 Introduction	2-1
2.2 Disposal of Tank Wastes	2-1
2.3 Cleanup of Past-Practice Units	2-1
2.4 RCRA and HWMA Operating Requirements	2-2
3.0 UNIT IDENTIFICATION, CLASSIFICATION, AND PRIORITIZATION	3-1
3.1 Introduction	3-1
3.2 Treatment, Storage, and Disposal Units	3-2
3.3 Past-Practice Units	3-2
3.4 Prioritization	3-3
3.5 Waste Information Data System and Hanford Site Waste Management Units Report	3-5
4.0 PROJECT AND UNIT MANAGERS	4-1
4.1 Project Managers	4-1
4.2 Unit Manager Role	4-1
5.0 INTERFACE OF REGULATORY AUTHORITIES	5-1
5.1 Regulatory Programs	5-1
5.2 Categories of Waste Units	5-1
5.3 Management of Treatment, Storage, and Disposal Units	5-2
5.4 Management of Past Practice Units	5-3
5.5 Treatment, Storage, and Disposal Units and Past-Practice Units Interface	5-4
5.6 Lead Regulatory Agency Concept	5-4
5.7 Integration with the National Environmental Policy Act	5-6
6.0 TREATMENT, STORAGE, AND DISPOSAL UNIT PROCESS	6-1
6.1 Introduction	6-1
6.2 Treatment, Storage, and Disposal Permitting Process	6-2
6.3 Treatment, Storage, and Disposal Closure Process	6-4
6.4 Response to Imminent and Substantial Endangerment Cases	6-7
6.5 Quality Assurance	6-7
7.0 PAST PRACTICES PROCESSES	7-1
7.1 Introduction	7-1
7.2 Preliminary Processes	7-1
7.3 Comprehensive Environmental Response, Compensation and Liability Act Past-Practice Unit Process	7-6
7.4 Resource Conservation and Recovery Act Past-Practice Unit Process	7-15

## CONTENTS (continued)

7.5	Cleanup Requirements . . . . .	7-18
7.6	Natural Resource Trusteeships . . . . .	7-21
7.7	Health Assessments . . . . .	7-22
7.8	Quality Assurance . . . . .	7-23
8.0	MEETINGS AND REPORTS . . . . .	8-1
8.1	Project Managers Meeting . . . . .	8-1
8.2	Unit Managers Meeting . . . . .	8-1
9.0	DOCUMENTATION AND RECORDS . . . . .	9-1
9.1	Categorization of Documents . . . . .	9-1
9.2	Document Review and Comment Process . . . . .	9-1
9.3	Document Revisions . . . . .	9-7
9.4	Administrative Record . . . . .	9-9
9.5	Distribution of Documents and Correspondence . . . . .	9-14
9.6	Data Access and Delivery Requirements . . . . .	9-15
10.0	COMMUNITY RELATIONS/PUBLIC INVOLVEMENT . . . . .	10-1
10.1	Introduction . . . . .	10-1
10.2	Public Information Repositories . . . . .	10-1
10.3	Mailing Lists and Newsletter . . . . .	10-2
10.4	Press Releases . . . . .	10-2
10.5	Public Meetings . . . . .	10-2
10.6	Public Comment Opportunities . . . . .	10-3
10.7	Public Hearing Opportunities . . . . .	10-5
10.8	Technical Assistance Grants . . . . .	10-5
10.9	Washington State Public Participation Grants . . . . .	10-5
10.10	Indian Tribes . . . . .	10-6
10.11	Citizen Suit Provisions . . . . .	10-7
11.0	WORK SCHEDULE AND OTHER WORK PLANS . . . . .	11-1
11.1	Introduction . . . . .	11-1
11.2	Work Schedule Format and Preparation . . . . .	11-1
11.3	Annual Updates and Other Revisions . . . . .	11-2
11.4	Work Plans and Supporting Schedules . . . . .	11-2
11.5	Other Work Plans . . . . .	11-3
11.6	Supporting Technical Plans and Procedures . . . . .	11-3
11.7	Tank Waste Remediation System Critical Path Process . . . . .	11-3
12.0	CHANGES TO ACTION PLAN/SUPPORTING SCHEDULES . . . . .	12-1
12.1	Introduction . . . . .	12-1
12.2	Authority to Approve Changes . . . . .	12-1
12.3	Formal Change Control Process . . . . .	12-2
12.4	Minor Field Changes . . . . .	12-2
12.5	Revision of Action Plan . . . . .	12-4
13.0	LIQUID EFFLUENT TREATMENT AND DISPOSAL . . . . .	13-1
13.1	Liquid Effluent Discharge Restrictions . . . . .	13-1
14.0	SIGNATURE . . . . .	14-1

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## CONTENTS (continued)

### APPENDIXES

A.	Definition of Terms and Acronyms . . . . .	A-1
B.	Listing of Treatment, Storage, and Disposal Groups/Units . . . . .	B-1
C.	Prioritized Listing of Operable Units . . . . .	C-1
D.	Work Schedule . . . . .	D-1
E.	Key Individuals . . . . .	E-1
F.	Supporting Technical Plans and Procedures . . . . .	F-1
G.	Data Management Initiatives . . . . .	G-1

94-6293-1002

## LIST OF FIGURES

6-1	Permitting Process Flowchart . . . . .	6-3
6-2	Closure Process Flowchart . . . . .	6-6
7-1	Aggregate Areas . . . . .	7-2
7-2	Comparison of Resource Conservation and Recovery Act Corrective Action and Comprehensive Environmental Response, Compensation, and Liability Act Remedial Processes . . . . .	7-3
7-3	Overview of the Remedial Investigation/Feasibility Study Process . . . . .	7-8
7-4	Remedial Investigation/Feasibility Studies (Resource Conservation and Recovery Act Facility Investigation/Corrective Measures Study) Work Plan Review and Approval . . . . .	7-10
7-5	Overview of the RCRA Facility Investigation/Corrective Measures Study Process . . . . .	7-16
9-1	Review and Comment on Primary Documents . . . . .	9-4
9-2	Part B Permit Application and Closure/Postclosure Plan Process Flowchart . . . . .	9-6
9-3	Review and Comment on Secondary Documents . . . . .	9-8
12-1	Change Control Sheet . . . . .	12-3

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# LIST OF TABLES

9-1	Primary Documents . . . . .	9-2
9-2	Secondary Documents . . . . .	9-3
9-3	Administrative Record Documents . . . . .	9-11
D	Major and Interim Milestones . . . . .	D-2

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EXECUTIVE SUMMARY  
FOR  
HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER  
ACTION PLAN

This Action Plan is an attachment to the Hanford Federal Facility Agreement and Consent Order (hereafter referred to as the "Agreement") between the U.S. Department of Energy (DOE), U. S. Environmental Protection Agency (EPA), and the State of Washington Department of Ecology (Ecology). The Agreement is the legal document that binds DOE to actions to comply with the Resource Conservation and Recovery Act (RCRA), the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), and the State of Washington Hazardous Waste Management Act.

**THE HANFORD SITE**

The Hanford Site was acquired by the Federal Government in 1943 for the construction and operation of facilities to produce plutonium for World War II. The site encompasses approximately 560 square miles within the Columbia River Basin. For over 20 years, Hanford facilities were primarily dedicated to the continuation of plutonium production for national defense and managing the wastes generated. In later years, programs at Hanford have become increasingly diverse, involving research and development for advanced reactors and renewable energy technologies. Currently DOE plans to phase out the defense production missions of Hanford, with the new emphasis of the Site being research and development, cleanup of waste units resulting from past operations, and achieving compliance with Federal and State laws.

**Treatment, Storage and Disposal Operations**

The Hanford Site has and will continue to provide for the Treatment, Storage and Disposal of hazardous and mixed wastes. Mixed wastes are those which contain both hazardous waste (i.e. chemical) and radioactive waste. In 1984, Congress amended RCRA, imposing, among other things, additional restrictions on hazardous waste storage and disposal activities. These restrictions have been referred to as the Land Disposal Restrictions (LDR). Some of the mixed wastes which are stored at Hanford are subject to LDR and cannot be land disposed until the wastes are treated in accordance with LDR regulations, or a variance is granted under 40 CFR 268. These wastes are stored in underground tanks or in other mixed waste units.

At present, DOE does not have the capability to treat all of the LDR mixed wastes at Hanford in accordance with LDR, and until such treatment occurs, disposal is prohibited. The mixed waste treatment systems which are currently available and treatment systems which are planned for the future must satisfy prescribed LDR treatment requirements. Until treatment systems capable of treating the mixed waste to meet the LDR treatment standards become available for Hanford wastes, storage of existing wastes and wastes which will be generated will continue. However, such storage will be in accordance with an approved plan for the management of LDR mixed waste.

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In addition to restrictions on land disposal, these LDR requirements also include specific conditions for storage of LDR wastes. The Department of Energy will submit schedules to develop and construct waste treatment systems necessary to achieve compliance with LDR storage requirements, which shall become effective upon approval by EPA (or Ecology upon authorization for LDR pursuant to Section 3006 of RCRA).

There are over 50 Treatment, Storage or Disposal (TSD) Groups on the Hanford Site which must be permitted and/or closed in accordance with RCRA and the State of Washington Hazardous Waste Management Act. A group represents one or more TSD units and reflects the level at which a Part B application and/or closure plan will be developed. These units range significantly in complexity from the closure of the single-shell tanks to the permitting of an individual treatment tank within a production facility. Ecology has the primary authority for issuing a final operating permit to the DOE. Until such time, the DOE continues to operate its TSD units under interim status regulations.

### Past-Practices

As previously noted, the Hanford Site has been in operation since the mid-1940's. These operations have resulted in approximately 1000 past-practice units that must be investigated and, if necessary, cleaned up. A past-practice unit is a waste management unit where wastes have been disposed (intentionally or unintentionally), and that is not subject to regulation as a TSD Unit.

The majority of the past-practice units on the Hanford Site contain mixed wastes (i.e., wastes containing both radioactive wastes and hazardous wastes). The remaining units contain only radioactive wastes or hazardous wastes, or are considered non-radioactive and non-hazardous. A large percentage of these waste units are either solid waste burial grounds or liquid disposal units, such as cribs, ponds, and ditches.

The groundwater beneath the Hanford Site has been contaminated as a result of these past-practices. Current data show tritium and nitrate to be the most widespread contaminants in the groundwater. Chromium, cyanide, and carbon tetrachloride are some of the hazardous chemicals which have been detected in the groundwater near operating areas.

## REGULATORY AUTHORITIES

### Resource Conservation and Recovery Act

RCRA was enacted by Congress in 1976. It requires "cradle to grave" management of hazardous waste by all generators, transporters, and owners/operators of treatment, storage, and disposal facilities handling hazardous wastes. A major goal of RCRA is to reduce the generation of hazardous waste.

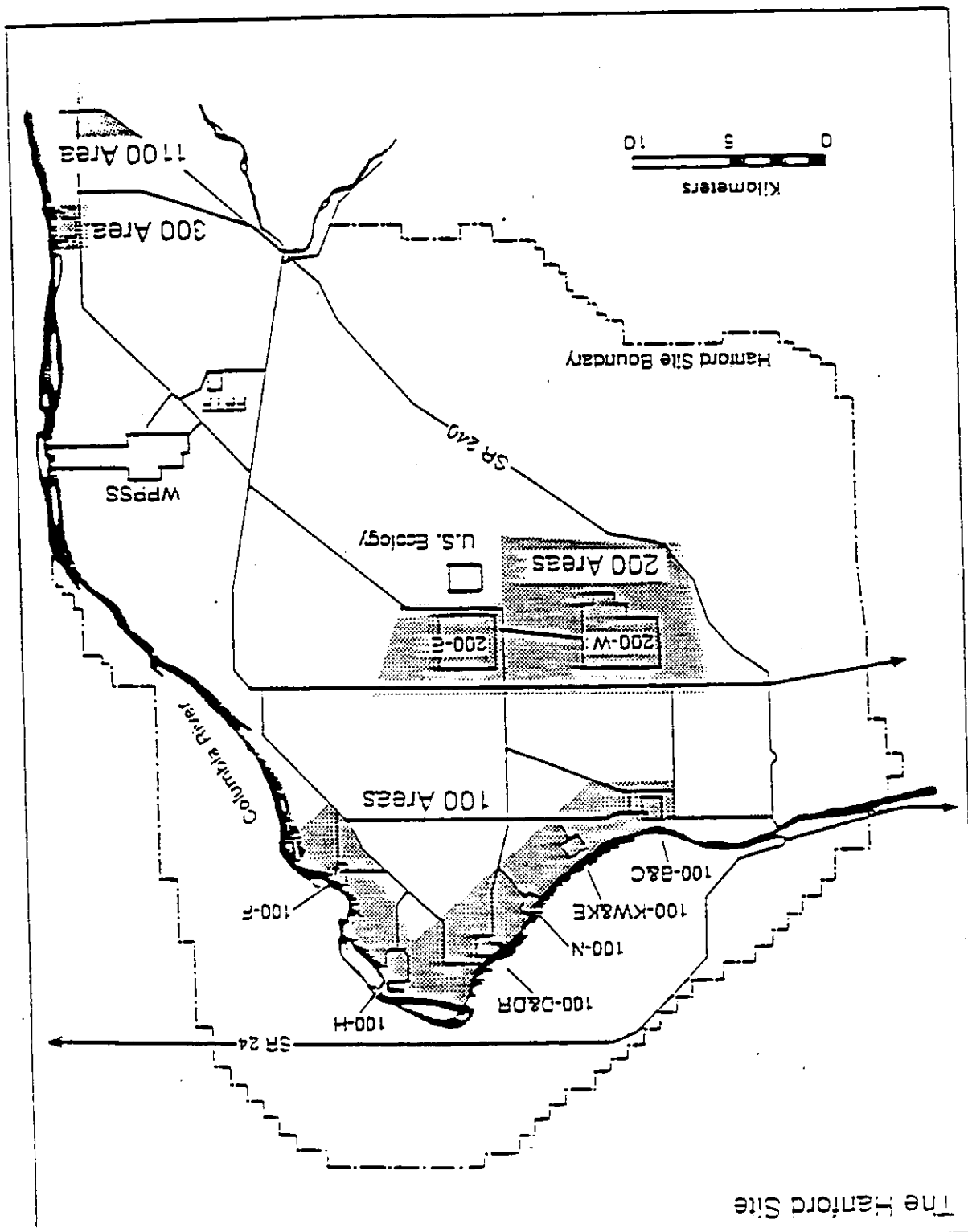
The Department of Ecology has the authority to carry out the RCRA Program in Washington through its own dangerous waste management program. Washington State regulations for dangerous waste management are substantially similar to, but more restrictive in some cases than, the RCRA regulations.

Ecology has not yet received authority from EPA to carry out the 1984 Hazardous and Solid Waste Amendments (HSWA) to RCRA. Until such authorization, EPA is responsible for implementing the provisions of the HSWA. HSWA provides for corrective action at all waste management units, irrespective of the date wastes were placed in the units.

#### **Comprehensive Environmental Response, Compensation and Liability Act**

CERCLA, also referred to as "Superfund", was enacted by Congress in 1980. Its purpose is to provide both funding and enforcement authority for cleaning up contaminated waste sites that have been created over the past decades. The funding portion of CERCLA does not apply to Federal facilities such as Hanford. EPA has been given authority for carrying out the provisions of CERCLA.

A key element for application of the cleanup provisions of CERCLA is the listing of a site on the National Priorities Listing (NPL). A Preliminary Assessment/Site Inspection (PA/SI) was completed in 1987 for the Hanford Site. On June 24, 1988 the EPA nominated four areas of the Hanford Site for inclusion on the NPL based on the results of the PA/SI. These four areas were officially listed on the NPL on November 3, 1989 (Federal Register 41015, October 4, 1989). These are the 100 Areas, 200 Areas, 300 Area, and 1100 Area as shown on the following map of the Hanford Site.



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## FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

The agreement is the legal document covering Hanford Site environmental compliance and cleanup. The general purposes of the agreement are:

- To ensure that the environmental impacts associated with past and present activities at the Hanford Site are thoroughly investigated and that appropriate response actions are taken as necessary to protect the public health, welfare, and the environment;
- To provide a framework for permitting TSD units and to promote an orderly, effective investigation and cleanup of contamination at the Hanford Site;
- To ensure compliance with RCRA and the Washington Hazardous Waste Management Act for TSD units including requirements covering permitting, interim status, land disposal restrictions, closure, and post-closure care;
- To establish a procedural framework for developing, prioritizing, implementing, and monitoring appropriate response actions at the Hanford Site in accordance with CERCLA, the National Contingency Plan (NCP), Superfund guidance and policy, and RCRA guidance and policy;
- To facilitate cooperation, exchange of information, and the coordinated participation of the parties in such actions; and
- To minimize the duplication of analysis and documentation.

The Agreement contains five parts: Part One contains introductory provisions; Part Two contains provisions governing hazardous waste treatment, storage, and disposal, facility compliance, permitting, closure, and post-closure activities; Part Three contains provisions governing remedial and corrective action activities; Part Four addresses the regulatory interfaces between EPA and the Ecology; and Part Five provides common provisions which apply to both Parts Two and Three. In addition, the Agreement delineates authorities, identifies enforcement provisions and provides for dispute resolution among the parties. This Action Plan is an attachment to the Federal Facility Agreement and Consent Order.

### ACTION PLAN

This Action Plan, as an enforceable part of the Agreement, provides the methods and procedures, and establishes the plans for (1) compliance, permitting, and closure under RCRA and the Washington State Hazardous Waste Management Act, and (2) cleanup of the Hanford Site under CERCLA and RCRA corrective action provisions.

## Major Milestones

The master plan and schedules for Action Plan work are found in Section 2.0, Milestones. These major milestones contain enforceable commitments for the most significant actions in the Action Plan, including:

- Closure of the Hanford single-shell tanks and final disposal of all tank wastes;
- Investigation and cleanup of all contamination at operable units;
- Permitting and closure of treatment, storage, and disposal units;
- Ceasing disposal of all contaminated liquids to soils; and
- Operation of the High-Level Waste Vitrification Plant.

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## Unit Identification, Categorization, and Prioritization

The approximately 55 TSD groups on the Hanford Site are identified in Appendix B as those which will continue to operate, and those which are to be closed. Actions associated with these TSD groups have been prioritized on the work schedules based on (1) the risk to public health and environment, (2) benefits received in minimizing wastes in terms of volume and toxicity, and (3) operational considerations.

Approximately 1000 past-practice units are identified in Appendix C. They have been grouped into approximately 74 operable units for the purposes of investigation and cleanup. An operable unit is a grouping of individual waste units based primarily on geographic area and common waste sources. The operable units are prioritized for investigation based on an initial assessment of environmental risk potential. The assessment considers waste volume, hazardous substances and their toxicity or health effects, and the potential for migration of these substances.

The twenty highest priority operable units have been schedule for action through 1992. The remaining operable units have been prioritized into groups and will be individually prioritized during the annual updates of the work schedule.

## Project and Unit Managers

EPA, DOE, and Ecology have designated individuals who will serve as Project Manager and who will be the primary points of contact for all activities to be carried out under the Action Plan. The primary responsibilities of the project managers are to implement the scope, terms, and conditions of the Action Plan, direct and provide guidance to their unit managers, maintain effective communication among each other, and report status to their respective management. In addition, the three parties shall each designate an individual as a unit manager for each operable unit on which they participate. The unit manager shall represent their respective party for all activity on the applicable operable unit, each TSD group/unit, or other specific Agreement activity on which they participate. The unit manager shall represent their respective party for all activity on the applicable operable unit and keep their respective project managers informed on status and problems which arise.

Project and unit managers will conduct periodic meetings concerning their respective areas of responsibility. These meetings will address status and problem areas. The goal is to maximize communication among the three parties.

## Integration of RCRA and CERCLA

RCRA and CERCLA overlap in many areas. RCRA also provides for corrective action for releases at RCRA facilities regardless of time of release. RCRA regulated wastes are also regulated under CERCLA. Many of the RCRA disposal units on the Hanford Site which are scheduled for closure are located in close proximity to past-practice units. These TSD units have been incorporated into the appropriate operable unit with the past-practice units so that integrated investigation and cleanup actions result. These TSD units will be closed under the authority of RCRA, generally in coordination with the past-practice

activities. In order to streamline the interface between RCRA and CERCLA authorities within an operable unit, the past-practice units contained within an operable unit will all be designated as either RCRA corrective action units or CERCLA units.

### **Lead Regulatory Agency Concept**

EPA and Ecology will use a "lead regulatory agency" approach to minimize duplication of effort and maximize productivity. Either EPA or Ecology will be the lead regulatory agency for an operable unit. The lead regulatory agency for a specific operable unit will be responsible for overseeing DOE actions at that operable unit. The regulatory agency which is not the lead regulatory agency will be designated as the support agency, and will assist the lead regulatory agency as needed. The decision of which agency is lead for each operable unit will be jointly made by EPA and Ecology.

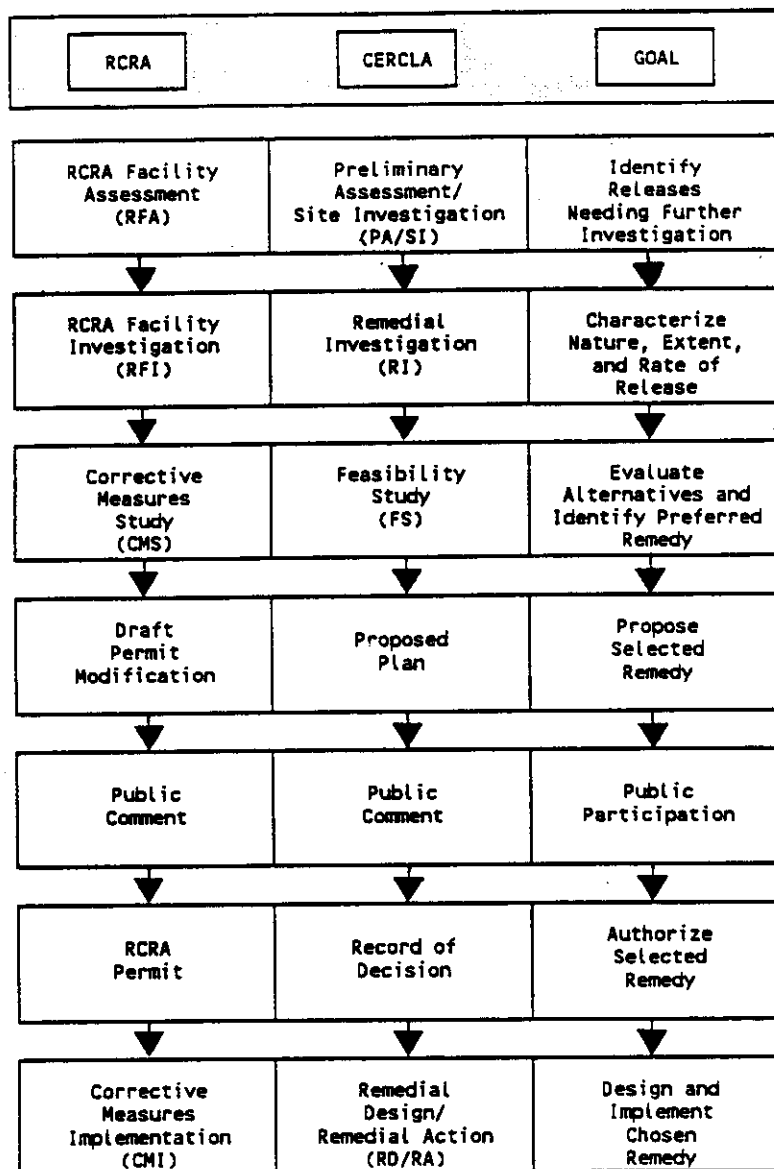
### **RCRA Permitting**

Since the Hanford Site is designated as a single RCRA facility one hazardous waste permit will be issued and maintained, and will address the treatment, storage and disposal of hazardous wastes. The initial permit will be issued for less than the entire facility, recognizing that not all of the TSD groups will be ready for a permit at the same time. Then the permit will be modified over time to incorporate additional TSD groups. The permit will also incorporate the cleanup actions selected for those past-practice units addressed under RCRA corrective action provisions. The permit will also address post-closure care requirements for those TSD units which have been closed, including those closed in conjunction with a past-practice operable unit.

### **Remedial and Corrective Action**

Either the CERCLA remedial action or the RCRA corrective action process will be used for the past-practice operable units. Under either process, DOE will investigate the contamination at the operable unit and study alternatives for cleaning up the problem. Following a public comment period, the appropriate regulatory agency will select the remedy. The following figure summarizes these processes, and shows that they are functionally equivalent.

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A work plan will be developed for each operable unit that will address all activities from the start of field investigation through the proposed selection of a remedy for cleanup. Both the work plan and the documentation of the selected remedy will be made available for public comment.

Appendix D provides the definitive work schedule which reflects specific dates for activities in support of the major milestones.

#### Documentation and Administrative Record

All documents will be categorized as either primary or secondary documents. Primary documents represent the interpretation of key data and reflect decisions on how to proceed. Secondary documents represent an

interim step in a decision making process, or are issued for information only and do not reflect key interpretations. Only primary documents are approved by the regulatory agencies and can be subjected to the dispute resolution process detailed in the Agreement. All documents (including secondary documents) will be reviewed by the regulatory agencies. The specific processes for document review, comment, and revision are contained in the Action Plan.

An Administrative Record will be established for each operable unit and TSD group, and will contain all of the documentation considered in arriving at CERCLA decision or RCRA permit. The Administrative Record file, including an index, will be available to the public for review in Richland, Seattle, and Olympia.

### Updates to the Action Plan

The Action Plan will be updated annually to expand the work schedule for the next year. The work schedule covers seven years, with the near-term shown in detail. In addition to work schedule updates, the Action Plan may be updated to reflect other modifications, such as changes to TSD groups and operable units, or changes in their priority.

### COMMUNITY RELATIONS

Section 10.0 of this Action Plan summarizes the community relations activities in support of the Agreement. A separate Community Relations Plan has been developed that meets the requirements for having such a plan at NPL sites, and also covers all the community relations needs of the Agreement, including RCRA public involvement requirements. The following summarizes the key elements of the Community Relations Plan:

- Public information repositories will be maintained in Seattle, Richland, and Spokane, Washington, as well as Portland, Oregon. Key documents and other information will be kept in these repositories for ready access by the public.
- Quarterly public information meetings will be held. Two meetings will be held each quarter; one in Richland, and the other rotated between other locations.
- Key decision documents will be made available for public comment prior to being finalized. Public meetings concerning these documents will be held as appropriate. Public hearings will be held upon request for draft permits or permit modifications.
- Annual updates to the work schedule will be subject to public comment.
- An active system of keeping the public informed will be implemented. A mailing list will be maintained for distribution of fact sheets and newsletters.
- A federal technical assistance grant program will be administered by EPA and a public participation grant program will be administered by Ecology.

- Interested Indian Tribes will be afforded special meetings and direct distribution of key documents upon request.

The intent is to involve the public extensively concerning environmental compliance and cleanup of the Hanford Site.

#### **CURRENT STATUS OF ACTIVITIES AT HANFORD**

Current status of activities addressed by the Agreement may be obtained from the status reports which are produced as a requirement of this Agreement. These reports are available for inspection at any of the four Information Repositories described in section 10.2 of this action plan. Current status is also provided through regular and special mailings from the three parties. Any person may be placed on the Hanford Site mailing list by contacting any of the community relations contacts shown in Appendix E of this action plan. Quarterly Public Information Meetings and other special public involvement meetings held in various locations in Washington and Oregon are also a source of current information. These meetings are announced via newspapers and direct mail notices to those on the Hanford Site mailing list.

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## ACTION PLAN

### 1.0 INTRODUCTION

#### 1.1 PURPOSE

The purpose of this action plan is to establish the overall plan for hazardous waste permitting, meeting closure and postclosure requirements, and remedial action under the Federal Resource Conservation and Recovery Act (RCRA) and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), and the Washington State Hazardous Waste Management Act. All actions required to be taken pursuant to this agreement shall be taken in accordance with the requirements of all applicable Federal and State laws and regulations.

This plan describes the U.S. Environmental Protection Agency (EPA) and State of Washington regulatory integration, and the methods and processes to be used to implement the Hanford Federal Facility Agreement and Consent Order, hereinafter referred to as "the Agreement," among the State of Washington Department of Ecology (Ecology), the EPA, and the U.S. Department of Energy (DOE). The parties recognize that hazardous waste compliance, permitting, closure and postclosure action, and remedial and corrective action at the Hanford Site will require a fully integrated effort involving the Federal RCRA, CERCLA, and the Washington State Hazardous Waste Management Act. For purpose of this action plan, the term RCRA means the RCRA as amended and the Washington Hazardous Waste Management Act (HWMA).

This action plan contains a work schedule (Appendix D), that is based on a rationale for setting priorities for work to be accomplished. This rationale is identified in Section 3.0. The work schedule identifies the schedules and milestones to be met in implementing this plan. Requirements and standards under Washington's Dangerous Waste Regulations and RCRA for hazardous waste generation and transportation, as specified in Chapter 173-303 of the Washington Administrative Code (WAC) and Title 40, Code of Federal Regulations (CFR), Parts 262 and 263, are not addressed by this action plan. However, this does not relieve the DOE from meeting these requirements.

Appendix A provides a definition of terms and acronyms as used in this action plan.

#### 1.2 REGULATORY AUTHORITIES

This action plan and its appendices are binding and enforceable on all parties unless otherwise noted. The regulatory authorities of the EPA and Ecology currently include, but are not limited to, the following:

- The EPA: Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended, and the Resource Conservation and Recovery Act of 1976 (RCRA), as amended
- Ecology: Hazardous Waste Management Act (HWMA), Chapter 70.105 Revised Code of Washington (RCW), as amended.

Specific regulatory authorities/clarifications include the following.

- On January 31, 1986, Ecology received final authority to implement the State Dangerous Waste Program in lieu of the Federal base RCRA program in the State of Washington. This does not authorize the State to implement the Hazardous and Solid Waste Amendment (HSWA) provisions. The HSWA will be implemented under the authority of the EPA until such time as Ecology receives authorization for HSWA. Section 6.2 provides for shared responsibilities for HSWA provisions between the State and the EPA. Before the State receives HSWA authorization, it must promulgate regulations as necessary to implement the program.
- Amendments to the base RCRA regulations (i.e., those not promulgated pursuant to HSWA) do not become effective until the State has promulgated regulations to implement them. In contrast, amendments to HSWA regulations become effective immediately under the direction of the EPA whether or not the State has received HSWA authorization.
- On August 19, 1987 CH. 70.105 RCW was amended to allow Ecology to regulate mixed waste. On November 23, 1987, Ecology received authorization from the EPA to regulate mixed waste in the State of Washington.
- The CERCLA remedy decision-making authority cannot be delegated to the State of Washington under the existing statute and will, therefore, continue to be exercised by the EPA.
- Ecology shall issue the RCRA permit under the State Dangerous Waste Program. Where the permit involves HSWA provisions, the EPA shall issue the HSWA portion of the permit. This will be a joint EPA/Ecology permit. When HSWA is delegated to the State, Ecology shall issue the entire permit to include HSWA provisions. The EPA shall retain an oversight role of Ecology's program and activities under the delegation of authority.
- Ecology shall maintain its authority under Ch.70.105 RCW to require corrective action at treatment, storage, and disposal (TSD) units to remediate groundwater contamination originating from such units in accordance with Part Four of the Agreement.

This action plan is based on existing Federal and State regulations. If changes to those regulations create inconsistencies between the action plan and the regulations, the action plan will be modified accordingly. To minimize any delay in implementation, it is the intent of the parties that an updated version of the action plan will be prepared prior to HSWA authorization (or partial authorization) to the State. Upon delegation, the updated action plan would then be implemented in an expeditious manner.

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### 1.3 ORGANIZATION OF ACTION PLAN

Section 2.0 identifies the major milestones agreed to by all parties under this Agreement. Major interrelationships between milestones are shown.

All parties realize that the Hanford Site is complex, with numerous waste management units. Section 3.0 describes an inventory and unit classification approach for effective organization and continuity of effort. It also includes criteria to be used for prioritizing the activities to be performed. Section 4.0 identifies a tiered management structure to oversee actions conducted under this plan. Section 5.0 describes the rationale and process by which waste management units at the Hanford Site will interface and be managed in accordance with the above-mentioned authorities. Section 6.0 describes the RCRA treatment, storage, and disposal unit processes and Section 7.0 describes past-practice unit processes in accordance with parts two and three of the Agreement respectively.

Section 8.0 describes meetings to be used to ensure effective communications between all parties. Section 9.0 defines the documents to be generated under this action plan, the classification and listing of primary and secondary documents, and the records systems to be implemented to preserve and access the documentation. Section 10.0 describes the method and processes necessary for community relations and effective public involvement.

Section 11.0 describes the purpose and format of the work schedule (Appendix D). In addition, Section 11.0 identifies the supporting plans that implement this action plan and the work schedule. Section 12.0 establishes a process for parties to propose and implement changes to elements of this action plan or its supporting plans. Section 12.0 also addresses the process for minor field changes. Section 13.0 addresses requirements for management of discharges of liquid effluents to the soil column at Hanford.

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## 2.0 MILESTONES

### 2.1 INTRODUCTION

This section discusses the milestones that have been agreed to by all parties in support of this Agreement. These milestones represent the actions necessary to ensure acceptable progress toward Hanford Site compliance with RCRA, CERCLA, and the Washington State Hazardous Waste Management Act (HWMA). Appendix D contains interim milestones and target dates which support major milestones.

The major milestones fall into the following categories:

- Disposal of tank wastes
- Cleanup of past-practice units
- RCRA and HWMA operating requirements.

New facilities required to support these activities are included in the category that they most directly support, recognizing that some of the facilities (e.g., laboratories) support more than one category.

The major milestones discussed in this section are based on existing funding and anticipated funding levels in the future. If funding levels are greater than anticipated, or if new sources of funding become available, the parties agree to renegotiate the milestones to decrease the amount of time necessary to complete the work.

### 2.2 DISPOSAL OF TANK WASTES

This category addresses the closure of the Hanford single-shell storage tanks and the final disposition of the wastes that are stored in single and double-shell tanks. The goals of these milestones are to reduce the current risk associated with single-shell tanks and to implement the long-term solutions for final disposition of all tank wastes. The milestones associated with single-shell tank closure support a schedule to complete all actions in accordance with a 40-year tank closure schedule.

### 2.3 CLEANUP OF PAST-PRACTICE UNITS

This category addresses the investigation and resultant remedial or corrective actions for past-practice units (see Section 3.3 for discussion of past-practice units) on the Hanford Site. The goal of these milestones is to achieve timely and appropriate cleanup of the Hanford Site. The milestones associated with operable unit investigations and cleanup support a schedule to complete all site cleanup actions in accordance with a 30-year site cleanup schedule.

#### 2.4 RCRA AND HWMA OPERATING REQUIREMENTS

This category addresses those actions necessary to satisfy RCRA requirements and obtain a final operating permit for all TSD units on the Hanford Site. It also addresses closure of those TSD units that are not being closed in conjunction with past-practice units. The goal of these milestones is to achieve compliance with all RCRA and State Dangerous Waste Program requirements.

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### 3.0 UNIT IDENTIFICATION, CLASSIFICATION, AND PRIORITIZATION

#### 3.1 INTRODUCTION

This section describes what constitutes a waste management unit at the Hanford Site. In addition, it describes how waste management units are classified, grouped for common investigation and remedial/correction action, and prioritized.

A waste management unit represents any location within the boundary of the Hanford Site that may require action to mitigate a potential environmental impact. This would include all solid waste management units (SWMUs) as specified under Section 3004(u) of RCRA. These waste management units were previously defined in the Hanford Site Waste Management Units Report (see Section 3.5). Waste management units include the following:

- Waste disposal units (including RCRA disposal units)
- Unplanned release units (including those resulting from spills)
- Inactive contaminated structures
- RCRA treatment and storage units
- Other storage areas.

The parties recognize and agree that certain activities related to the stabilization and transition of facilities, before or after the shutdown decision has been made, through the decommissioning and decontamination (D&D) of structures by DOE, are subject to RCRA, CERCLA or other regulatory controls related to the Agreement. The generation and/or discharge of (Ecology/EPA) regulated substances or wastes (including the treatment, storage and disposal of those substances or wastes) shall be subject to this Agreement. Appropriate specific requirements and/or Tri-Party Agreement Milestones for the completion of key activities that generate or discharge regulated substances or wastes shall be incorporated into the Action Plan. Agreed-upon key transition and D&D activities not subject to Ecology/EPA regulation that are critical path to cleanup of an aggregate area will be established as target dates. The goal is to conduct regulated and nonregulated work in an orderly sequence to insure coordination with other cleanup actions.

In the event that a contaminated structure is found to be the source of a release (or presents a substantial threat of a release) of hazardous substances, hazardous wastes, or hazardous constituents to the environment, the investigation and remediation of such a release (to include remediation of structures, as necessary), where subject to CERCLA or RCRA, shall be subject to this Agreement. Specific requirements shall be incorporated into the Action Plan as appropriate. Releases which have already been identified have been included in the Action Plan as waste management units and assigned to operable units (see Appendix C).

As part of any action being taken under either RCRA or CERCLA for a contaminated structure, EPA and Ecology shall consider available information related to D&D activities, including environmental impact statements. All

hazardous wastes generated by the D&D activities or stored at these storage areas shall be managed in accordance with applicable Federal and State hazardous waste regulations.

### 3.2 TREATMENT, STORAGE, AND DISPOSAL UNITS

Treatment, storage, and disposal units are those units which will be permitted (for operation and/or postclosure care) and/or closed, to include interim status postclosure care, under the Washington State Dangerous Waste Regulations (173-303 WAC) and the applicable provisions of HSWA. Appendix B provides a current listing of these units, or group of units (with individual units defined); identifies whether the TSD group/unit will be permitted for operation or closed; and identifies the assigned operable unit, if applicable. A TSD group represents a combination of units that are combined for purposes of preparing a permit application or closure plan. The schedule of permitting activities or closures will be established by Ecology in cooperation with the EPA and DOE. Some TSD groups/units are included within operable units (see 3.3 below) and will be addressed concurrently with past-practice activities as defined in Section 5.5. A further discussion of TSD groups/units is provided in Section 6.0.

### 3.3 PAST-PRACTICE UNITS

A past-practice unit is a waste management unit where wastes or substances (intentionally or unintentionally) have been disposed and that is not subject to regulation as a TSD unit as specified in Section 3.2.

Due to the relatively large number of past-practice units at the Hanford Site, a process has been established for organizing these units into groups called operable units. The concept of operable units is to group the numerous units (primarily by geographic area) into manageable components for investigation and remedial action and to prioritize the cleanup work to be done at the Site.

The Waste Information Data System (WIDS) (see Section 3.5) contains information on waste management units that was used to support the development of operable units. This information, combined with operable unit identification and prioritization criteria described in this section, resulted in the initial designation of approximately 75 operable units across the Hanford Site. The Hanford Operable Units Report (currently titled "Preliminary Operable Units Designation Project") documents the assignment of units to operable units and prioritizes the operable units. The Hanford Operable Units Report is discussed further in Section 7.0. Each of the operable units will be subject to an investigation in the form of either a CERCLA or a RCRA past-practice process as described in Sections 7.3 and 7.4, respectively. Appendix C includes a current list of all the past-practice units on the Hanford Site by operable unit.

Some TSD units, primarily land disposal units, will be investigated and managed in conjunction with past-practice units and have been assigned to appropriate operable units (see Appendix B for current assignment of TSD groups/units to operable units). The information resulting from the investigation will be used to supplement the preparation of the Part B

applications and/or closure plans for such TSD groups/units. Those TSD units not assigned to an operable unit are typically treatment or storage units that are likely to be "clean closed" as described in Section 6.3.1.

Individual past-practice units (and selected TSD units) have been assigned to a specific operable unit based on the following criteria:

- General patterns of waste disposal from specific process sources
- Spatial relationship to other waste units
- Contribution to the same groundwater contaminant plume
- Physical characteristics of area (e.g., geologic/hydrogeologic)
- Access considerations (e.g., buildings, buried pipes)
- Anticipation of similar remedial action strategy (economy of scale)
- Reasonable number of total units to effectively manage.

In addition to the operable units discussed above, groundwater operable units can be established where multiple sources from different operable units have contributed to the same plume. Operable units that are associated with a groundwater operable unit are referred to as source operable units. The schedule for investigation of each groundwater operable unit will coincide with the schedule for investigation of the source operable unit that is the major contributor to the plume. Other associated source operable units that are lower priority will be investigated at a later time, in accordance with the established criteria for prioritization of operable units.

### 3.4 PRIORITIZATION

This section describes the bases for prioritizing operable units and those TSD groups/units that are not included within operable units.

#### 3.4.1 Prioritization of Operable Units

Operable units are prioritized based on an initial assessment of risk potential to ensure that action is focused on the greater hazard. Criteria for evaluating and remediating potential hazards include the following information:

- Volume of wastes or hazardous substances
- Hazardous substances identification and concentration
- Toxicity or health effects of the hazardous substances
- Potential for migration to receptors via all environmental pathways.

In addition, the following factors are used to determine priority:

- Available technology to investigate or remediate the operable unit

- Operation consideration (e.g., timing of decommissioning activities)
- Consideration to those operable units that include TSD units.

Appendix C lists the current priority of operable units for investigation. This is based on currently available information and data. As new information and data become available, these priority assignments may be modified. The Hanford Operable Units Report provides the rationale and justification for the prioritization of the operable units. This priority is the basis for the work schedule (Appendix D). Procedures for modification of Appendix C are described in Section 12.0.

The highest priority operable units have been individually ranked and scheduled for investigation, whereas the remaining operable units have been prioritized into groups (see Appendix C). The single-shell tank operable units are unique and will be addressed separately as part of a supporting work plan.

#### 3.4.2 Prioritization of Treatment, Storage, and Disposal Units

All TSD groups/units are subject to a permitting and/or closure process described in Section 6.0. Those TSD groups/units assigned to an operable unit will be prioritized in conjunction with past-practice priorities for purposes of investigation. The order in which permit applications or closure plans will be developed for the remaining TSD groups/units is based on consideration of the following criteria.

- Environmental Risk. The risk to public health and environment is the most important consideration. Any action that will significantly reduce the risk to public health and/or the environment will be considered the highest priority.
- Waste Minimization. Waste minimization is central to the goal of reducing environmental risks and bringing about environmental compliance for continuing operations and for new units at the Hanford Site. Therefore, the parties agree that Ecology's "Priority Waste Management Policy" (Ecology 86-07), established pursuant to CH. 70.105.150 RCW, shall be adhered to as guidance for purposes of establishing permitting priorities, in addition to evaluating proposed changes in operational procedures, and for the development and implementation of new waste management strategies. This policy defines the following prioritized actions: (1) waste reduction, (2) recycling, (3) treatment, (4) stabilization, and (5) land disposal.
- Permit Application Dates Required by Law. The Hazardous and Solid Waste Amendments of 1984 (HSWA) mandated dates for submittal of Part B permit applications. The dates for submitting dangerous waste (excluding mixed waste units) Part B permit applications were as follows:
  - Land disposal units: November 8, 1985  
(all required Part B applications were submitted prior to this date)

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- Incineration units: November 8, 1986  
(not applicable for the Hanford Site)
- Treatment and storage units: November 8, 1988.

Part A permit applications for all mixed waste units that will be operating under interim status were due by May 23, 1988 (this date was met for all such known units). Part B permit applications for the disposal of mixed waste to land disposal units were due by November 23, 1988 (this date was met for all such known units), including the certification statement required by Section 3005(e)(2) of RCRA, that the unit is in compliance with the interim status groundwater monitoring requirements. There are no statutory Part B permit application dates for mixed waste treatment and storage units.

- Operational Requirements. Some operational considerations are important for maintaining or achieving environmental compliance, continuation of Hanford Site operations, or achieving cleanup in a cost-effective manner. Examples of such operational considerations include permitting a treatment unit for operation or accelerating closure actions to complement decontamination and decommissioning of related structures.

### 3.5 WASTE INFORMATION DATA SYSTEM AND HANFORD SITE WASTE MANAGEMENT UNITS REPORT

The Waste Information Data System (WIDS) is maintained by the DOE and identifies all waste management units on the Hanford Site. This data base will describe the current status of each unit (e.g., active/inactive, TSD, CERCLA past-practice or RCRA past-practice), and will include other descriptive information (e.g., location, waste types). A hard copy and/or an electronic data transfer (or equivalent) of the WIDS data base will be provided to the EPA and Ecology. Upon written request, the DOE will provide data from the WIDS data base within 14 days from receipt of request. If additional time is required, the DOE will notify the requestor within three days of receipt of the request. A change control system is provided as part of the WIDS data base to document and trace all changes dealing with current status on a unit.

The WIDS data base provides the basis for the Hanford Site Waste Management Units Report (HSWMUR). The HSWMUR was initially submitted to the EPA on May 15, 1987, in response to RCRA Section 3004(u) of the HSWA. This document lists all known waste management units (including unplanned release units) at the Hanford Site and summarizes the wastes handled, dates of use, and other information about each unit. In January of each year the DOE will reissue the HSWMUR, if determined necessary by the project managers, incorporating all changes since the last report. A copy will be provided to each public information repository.

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## 4.0 PROJECT AND UNIT MANAGERS

### 4.1 PROJECT MANAGERS

The EPA, DOE, and Ecology shall each designate one individual who will serve as project manager and who will be the primary point of contact for all activities to be carried out under this action plan. The current project managers are identified in Appendix E.

The primary responsibilities of the project managers are as follows:

- Implement the scope, terms, and conditions of this action plan
- Approve changes to the action plan per Section 12.0
- Direct and provide guidance to their unit managers
- Maintain effective communication among the project managers, and report status to their respective management.

Subject to the limitations set forth in Article XXXVII (Access) of the Agreement and, in addition to other authorities and responsibilities, the Ecology and EPA project managers, or their designated representative(s), shall have the authority to: (1) take samples, request split samples of the DOE samples, and ensure that work is performed properly and pursuant to the EPA protocols as well as pursuant to the attachments and plans incorporated into this Agreement; (2) observe all activities performed pursuant to this Agreement, take photographs, and make sure other reports are prepared on the progress of the work as the project manager deems appropriate; and (3) review records, files, and documents relevant to this Agreement. In addition, the project manager for the EPA or Ecology has authority to require changes to any procedural, design, or specification document that is referenced in a supporting work plan. Such required changes will be subject to the appropriate dispute resolution process as specified in the Agreement.

The DOE project manager or his or her representative shall be physically present on the Hanford Site or reasonably available to supervise work performed at the Hanford Site during the performance of work pursuant to this Agreement and shall be available to the EPA and Ecology project manager for the pendency of this Agreement.

Other authorities and responsibilities are identified in the context of this action plan. The project managers may delegate their authority and responsibilities to the unit managers (see Section 4.2), as appropriate.

### 4.2 UNIT MANAGER ROLE

The EPA, DOE, and Ecology shall each designate an individual as a unit manager for each operable unit, each TSD group/unit, or other specific Agreement activity on which they participate. Unit managers will only be identified for those areas where effort is ongoing or planned in the near future. A listing of currently assigned unit managers from all three parties shall be maintained and distributed to all parties by the DOE project manager. Each unit manager shall represent his/her respective party and keep his/her project manager informed on the status and any problems that arise.

In general, the EPA and Ecology will both assign a unit manager to each operable unit or separate TSD group/unit. The unit manager from the lead regulatory agency (see Section 5.6 for discussion of lead regulatory agency) shall be responsible for regulatory oversight of all activities required by this action plan for that operable unit or TSD group/unit.

The unit manager from the supporting regulatory agency shall serve as a liaison for his/her agency and shall stay informed of the general status of issues and problems encountered at the operable unit. The unit manager for the supporting regulatory agency shall be responsible for making decisions related to issues for which the supporting regulatory agency maintains authority. All such decisions shall be made in consideration of recommendations made by the unit manager for the lead regulatory agency.

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## 5.0 INTERFACE OF REGULATORY AUTHORITIES

### 5.1 REGULATORY PROGRAMS

The RCRA, CERCLA, and State Dangerous Waste Program overlap in many areas. In general, CERCLA was created by Congress to respond to the release of hazardous substances and to investigate and respond to releases and potential releases from past-practice activities. The RCRA and State Dangerous Waste Program were created to prevent releases at active facilities that generate, store, treat, transport, or dispose of hazardous wastes or hazardous constituents. The RCRA, as amended by HSWA, also provides for corrective action for releases at RCRA facilities regardless of time of release. This section is intended to clarify how these various programs will interface to achieve an efficient regulatory program.

Regulatory decision making responsibility and associated signature authority shall remain with the regulatory agency having legal authority for those decisions, regardless of whether that agency is the lead regulatory agency for the work (see Section 5.6 for lead regulatory agency concept). For example, regulatory decisions with respect to regulated TSD units shall be made by Ecology (or EPA, for those HSWA provisions for which Ecology has not yet been authorized). Any regulatory decisions with respect to remedial action at past practice units shall be made by EPA for any units classified as a CERCLA past practice unit. For any unit classified as a RCRA past practice unit, EPA shall be the regulatory decision-maker for corrective action at that unit prior to HSWA corrective action authorization for the State, and Ecology shall be the regulatory decision-maker after such authorization.

### 5.2 CATEGORIES OF WASTE UNITS

There are three categories of units and related statutory or regulatory authorities that will be addressed under this action plan. These categories are TSD unit, RCRA past-practice (RPP) unit, and CERCLA past-practice (CPP) unit. The following definitions will be used consistently throughout the remainder of this document.

#### 5.2.1 Treatment, Storage, and Disposal Unit

This is a unit that has received or is currently receiving RCRA hazardous waste and hazardous constituents after November 19, 1980, or State-only hazardous waste, as defined in 173-303 WAC, after March 12, 1982. It also includes units at which such wastes will be stored, treated, or disposed in the future, except as provided by 173-303-200 WAC (waste accumulation times that do not require permitting). The TSD units are those that must receive a RCRA permit for operation or postclosure care and/or that must be closed to meet State standards. Section 6.0 describes the processes to be used to permit and/or close TSD units.

#### 5.2.2 RCRA Past-Practice Unit

The purpose of this category is to address releases of RCRA hazardous wastes or constituents from sources other than TSD units at the Hanford Site regardless of the date of waste receipt at the unit. This includes single-incident releases at any location on the Site and corrective action beyond the

Site boundary. The HSWA corrective action authority is available for past-practice units, and consists of three separate components as follows:

- RCRA Section 3004(u). Section 3004(u) of RCRA provides authority for corrective action at waste management units at a facility seeking a RCRA permit. This includes units that received any solid waste, as defined in 40 CFR Part 261.2, including RCRA hazardous wastes or hazardous constituents, at any time. Hazardous constituents are those that are listed in 40 CFR Part 261 Appendix VIII. Those waste management units that will be addressed as RPP units under Section 3004(u) are so designated in Appendix C.
- RCRA Section 3004(v). RCRA Section 3004(v) specifies that corrective action to address releases from a RCRA facility will extend beyond the physical boundaries of the Site, to the extent necessary to protect human health and the environment. The EPA may implement RCRA Section 3004(v) in any situation where hazardous wastes or constituents are migrating off the Hanford Site. Section 3004(v) does not apply to releases within the boundary of the Hanford Site.
- RCRA Section 3008(h). RCRA Section 3008(h) is a broad corrective action authority that is applicable to the Hanford Site as long as RCRA interim status is maintained. It is more expansive than RCRA Section 3004(u), in that it can be used to address corrective action for any release of RCRA hazardous waste or constituents, including single-spill incidents, and can be used to address releases that migrate offsite.

### 5.2.3 CERCLA Past-Practice Unit

The CPP units include units that have received hazardous substances, as defined by CERCLA, irrespective of the date such hazardous substances were placed at the unit. Those waste management units that will be addressed as CPP units are so designated in Appendix C.

For the purposes of this action plan, it is necessary to distinguish between a CPP unit, a RPP unit, and a TSD unit. Any TSD unit, as defined in Section 5.2.1, will be classified as a TSD unit, rather than a CERCLA unit, even if it is investigated in conjunction with CPP units. The CPP and RPP units will be distinguished in accordance with Section 5.4.

### 5.3 MANAGEMENT OF TREATMENT, STORAGE, AND DISPOSAL UNITS

As previously stated, TSD units are identified in Appendix B. Any additional TSD units that are subsequently identified shall be added to Appendix B in accordance with the process described in Section 12.2.

Unless closed in accordance with Sections 6.3.1 or 6.3.3, TSD units shall be permitted for either operation or postclosure care pursuant to the authorized State Dangerous Waste Program (173-303 WAC) and HSWA. Prior to permitting or closure of TSD units, DOE shall achieve (in accordance with the work schedule contained in Appendix D) and maintain compliance with applicable

interim status requirements. All TSD units that undergo closure, irrespective of permit status, shall be closed pursuant to the authorized State Dangerous Waste Program in accordance with 173-303-610 WAC.

#### 5.4 MANAGEMENT OF PAST-PRACTICE UNITS

This section describes the rationale for placing units in either a RCRA or a CERCLA past-practice category for corrective action as defined below. In many cases, either authority could be used with comparable results. The categories are as follows:

- The CPP units, (see Section 7.3)
- The RPP units, under authority of RCRA Sections 3004(u), 3004(v), and 3008(h) (see Section 7.4).

Since the Hanford Site was proposed for inclusion on the National Priorities List (NPL) (Federal Register, June 24, 1988), and was placed on the NPL on November 3, 1989 (Federal Register, October 4, 1989), the parties agree that any units managed as RPP units shall address all CERCLA hazardous substances for the purposes of corrective action. The parties agree that all of the wastes regulated under the State Dangerous Waste Program (173-303 WAC) shall be addressed as part of any CERCLA remedial action or RCRA corrective action.

Section 121 of CERCLA, with provision for waivers in a limited number of circumstances, requires that remedial actions attain a degree of cleanup that meets "applicable or relevant and appropriate Federal and State environmental requirements" (ARAR). Accordingly, (1) all State-only hazardous wastes will be addressed under CERCLA, and (2) RCRA standards for cleanup or TSD requirements (as well as other applicable or relevant and appropriate Federal and State regulations) will be met under a CERCLA action (See Section 7.5 for further discussion of cleanup requirements). This eliminates many discrepancies between the two programs and lessens the significance of whether an operable unit is placed in one program or the other.

All past-practice units within an operable unit will be designated as either RPP units or CPP units. This designation will ensure that only one past-practice program will be applied at each operable unit. The corrective action process selected for each operable unit shall be sufficiently comprehensive to satisfy the technical requirements of both statutory authorities and the respective regulations.

If an operable unit consists primarily of past-practice units (i.e., no TSD units or relatively insignificant TSD units), CERCLA authority will generally be used for those past-practice units. The CERCLA authority will also be used for past-practice units in which remediation of CERCLA-only materials comprises the majority of work to be done in that operable unit.

The RPP authority will generally be used for operable units that contain significant TSD units and/or lower priority past-practice units.

Currently assigned RPP and CPP designations are shown in Appendix C. Further assignments will be made in accordance with Section 12.2 prior to initiation of any actions for those operable units.

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The EPA and Ecology shall jointly determine whether an operable unit will be managed under the authority of RPP or CPP. Such designation may be changed due to the discovery of additional information concerning the operable unit. If a change in authority is proposed after the Remedial Investigation/Feasibility Study (RI/FS) or RCRA Facility Investigation/Corrective Measures Study (RFI/CMS) work plan, as described in Section 7.0, has been submitted to the lead regulatory agency (see Section 5.6 on discussion of lead regulatory agency), the change requires the agreement of all parties.

## **5.5 TREATMENT, STORAGE, AND DISPOSAL UNITS AND PAST-PRACTICE UNITS INTERFACE**

In some cases, TSD units are closely associated with past-practice units at the Hanford Site, either geographically or through similar processes and waste streams. Although disposition of such units must be managed in accordance with Section 6.0, a procedure to coordinate the TSD unit closure or permitting activity with the past-practice investigation and remediation activity is necessary to prevent overlap and duplication of work, thereby economically and efficiently addressing the contamination. In Appendix B, selected TSD groups/units have been initially assigned to operable units based on the criteria defined in Section 3.3. If at a later date TSD groups/units need to be deleted from or added to an operable unit, the procedures defined in Section 12.2 will be used.

Ecology, the EPA, and DOE agree that past-practice authority may provide the most efficient means for addressing mixed-waste groundwater contamination plumes originating from a combination of TSD and past-practice units. However, in order to ensure that TSD units within the operable units are brought into compliance with RCRA and State hazardous waste regulations, Ecology intends, subject to part four of the Agreement, that all remedial or corrective actions, excluding situations where there is an imminent threat to the public health or environment as described in Section 7.2.3, will be conducted in a manner which ensures compliance with the technical requirements of the HWMA (Chapter 70.105 RCW and its implementation regulations). In any case, the parties agree that CERCLA remedial actions and, as appropriate, HSWA corrective actions will comply with ARARs.

## **5.6 LEAD REGULATORY AGENCY CONCEPT**

The EPA and Ecology have selected a lead regulatory agency approach to minimize duplication of effort and maximize productivity. Either the EPA or Ecology will be the lead regulatory agency for each operable unit. This concept combines TSD activity with past-practice unit activity in cases where TSD units are assigned to operable units.

The lead regulatory agency for a specific operable unit will be responsible for overseeing the activities covered by this action plan at that operable unit, ensuring that all applicable requirements are met. However, the EPA and Ecology retain their respective legal authorities and shall make the decisions on actions to be taken pursuant to those authorities. Regulatory oversight activity, including preparation of responses to documents submitted by the DOE, will be done by the lead regulatory agency for each operable unit. The regulatory agency that is not the lead regulatory agency will be designated as the supporting regulatory agency. The role of the



supporting regulatory agency will be to assist the lead regulatory agency as needed, and to make decisions on those issues for which it has legal authority.

The assignment of the lead regulatory agency for an operable unit will be based on the following criteria.

- The EPA will generally be the lead regulatory agency in the following cases:
  - Operable units that contain no TSD units or that contain low-priority TSD units
  - Operable units that contain primarily CERCLA-only materials.
- Ecology will generally be the lead regulatory agency in the following cases:
  - Operable units that consist of major TSD units, with limited past-practice units
  - Operable units that contain higher priority TSD units and lower priority past-practice units.

In some cases, the above criteria may overlap, such that either the EPA or Ecology could be assigned as the lead regulatory agency. In this situation, other criteria would be used, such as available resources to undertake additional work in a timely manner, the designation and characteristics of an adjoining operable unit, or whether the characteristics of a given operable unit are similar to the characteristics of another operable unit that has already been managed by either agency.

Currently assigned lead regulatory agency designations are shown in Appendix C. Additional assignments will be made in accordance with Section 12.2 prior to any action on the operable unit. The lead regulatory agency for each operable unit shall maintain its role through completion of all remedial or corrective actions at the operable unit.

The decision as to which agency will assume the lead role at an operable unit will be a joint determination by the EPA and Ecology. Such determinations are subject to change based on additional information subsequently discovered concerning an operable unit, or for any other reason, as agreed upon by the EPA and Ecology. The parties intend that once the lead regulatory agency has been assigned to an operable unit and the RI/FS (or RFI/CMS) work plan, as described in Section 7.0, has been approved, the lead regulatory agency designation will not change except for an extreme circumstance.

## 5.7 INTEGRATION WITH THE NATIONAL ENVIRONMENTAL POLICY ACT

The purpose of the NEPA requirements is to ensure that potential environmental impacts of investigation and cleanup activity are assessed. These assessments, when determined to be required, will be made primarily as part of the CERCLA remedial action and RCRA corrective action processes. These processes will be supplemented, as necessary, to ensure compliance with NEPA requirements.

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## 6.0 TREATMENT, STORAGE, AND DISPOSAL UNIT PROCESS

### 6.1 INTRODUCTION

This section discusses the requirements of RCRA and the State of Washington Hazardous Waste Management Act, Chapter 70.105 RCW, and pertains to all units that were used to store, treat, or dispose of RCRA hazardous waste and hazardous constituents after November 19, 1980; State-only hazardous waste after March 12, 1982; and units at which such wastes will be stored, treated, or disposed in the future, except as provided by 173-303-200 WAC.

A list of these units, or grouping of units, is provided in Appendix B. Section 3.0 identifies the criteria by which these units will be scheduled for permitting and closure actions.

Some of the TSD groups/units (primarily land disposal units) have been included in operable units, as discussed in Section 3.3, and will in most cases be investigated on a separate priority schedule, as discussed in Section 3.4. When this situation exists, the Part B permit application and/or closure plan will be prepared concurrently with the operable unit investigation.

Currently identified actions necessary to bring TSD units into compliance with Federal and State laws are identified in the work schedule (see Appendix D) including necessary interim milestones. These interim milestones are consistent with the major milestones for achieving interim status compliance requirements specified in Section 2.4. A schedule for completing interim status compliance actions is provided as part of Appendix D.

The RCRA land disposal restrictions (LDR) require that established treatment requirements be met prior to land disposal of hazardous wastes. While treatment capacity generally exists for the nonradioactive hazardous wastes which are subject to LDR, treatment is currently not available for the mixed wastes subject to LDR which require storage at the Hanford Site.

In accordance with Milestone M-26-00, DOE will submit the "Hanford Land Disposal Restrictions Plan for Mixed Wastes," (LDR Plan) to EPA and Ecology. This plan will describe a process for managing mixed wastes subject to LDR at the Hanford Site and will identify actions which will be taken by DOE to achieve full compliance with LDR requirements.

These actions will be taken in accordance with approved schedules specified in the LDR Plan and in the Work Schedule (Appendix D). The DOE will submit annual reports which shall update the LDR Plan and the prior annual report, including plans and schedules. The annual report will also describe activities taken to achieve compliance and describe the activities to be taken in the next year toward achieving full compliance. The LDR Plan and annual reports are primary documents, subject to review and approval by EPA, in consultation with Ecology. EPA also has approval authority for schedules in the LDR Plan and annual reports. Changes to approved final schedules must be made in accordance with the Change Control System described in Section 12.0. When Ecology receives authorization from EPA to implement the LDR provisions of RCRA pursuant to Section 3006 of RCRA, Ecology will review and approve the annual reports, plans, and schedules in consultation with EPA, and will otherwise administer the LDR requirements.

## 6.2 TREATMENT, STORAGE, AND DISPOSAL PERMITTING PROCESS

The Hanford Site has been assigned a single identification number for use in State Dangerous Waste Program/RCRA permitting activity. Accordingly, the Hanford Site is considered to be a single RCRA facility, although there are numerous unrelated units spread over large geographic areas on the Site.

Since all of the TSD groups/units cannot be permitted simultaneously, Ecology and the EPA will issue the initial permit for less than the entire facility. This permit will eventually grow into a single permit for the entire Hanford Site. The Federal authority to issue a permit at a facility in this manner is found in 40 CFR 270.1(c)(4). Any units that are not included in the initial permit will normally be incorporated through a permit modification. At the discretion of Ecology and EPA, the permit revocation and reissuance process may be used.

The process of permit modification is specified in 173-303-830 WAC and 40 CFR 270.41. A permit modification does not affect the term of the permit (a permit is generally issued for a term of 10 years). Proposed modifications are subject to public comment, except for minor modifications as provided in 173-303-830(4) WAC and 40 CFR 270.42.

The process of revocation and reissuance is specified in 173-303-830 WAC and 40 CFR 270.41. Revocation and reissuance means that the existing permit is revoked and an entirely new permit is issued, to include all units permitted as of that date. In this case, all conditions of the permit to be reissued would be open to public comment and a new term (10 years in most cases) would be specified for the reissued permit.

Figure 6-1 depicts a flowchart for processing all operating permits for TSD groups/units and for processing postclosure permits for TSD groups/units that will close with hazardous wastes or constituents left in place. The permitting process applies to existing units, expansion of units under interim status, and new units (units that do not have interim status and must have a permit prior to construction).

Ecology shall normally be responsible for drafting permit conditions related to HSWA requirements. In addition, Ecology will work with EPA on HSWA issues and related policy development associated with implementation regarding mixed waste sites. Until the HSWA provisions have been delegated from EPA to Ecology through the authorization process, EPA will maintain final approval rights for those permit conditions pursuant to HSWA authority that have not been delegated. Therefore, certain conditions of the joint permit will be enforceable by Ecology, others will be enforceable by EPA, and some conditions will be enforceable by both agencies. The permit will identify which conditions are enforceable by each agency.

Disputes concerning RCRA requirements prior to partial or final delegation will be addressed in accordance with Article VIII of the Agreement for those relevant portions for which Ecology has authority, and in accordance with Article XVI of the Agreement for those portions for which EPA retains authority.

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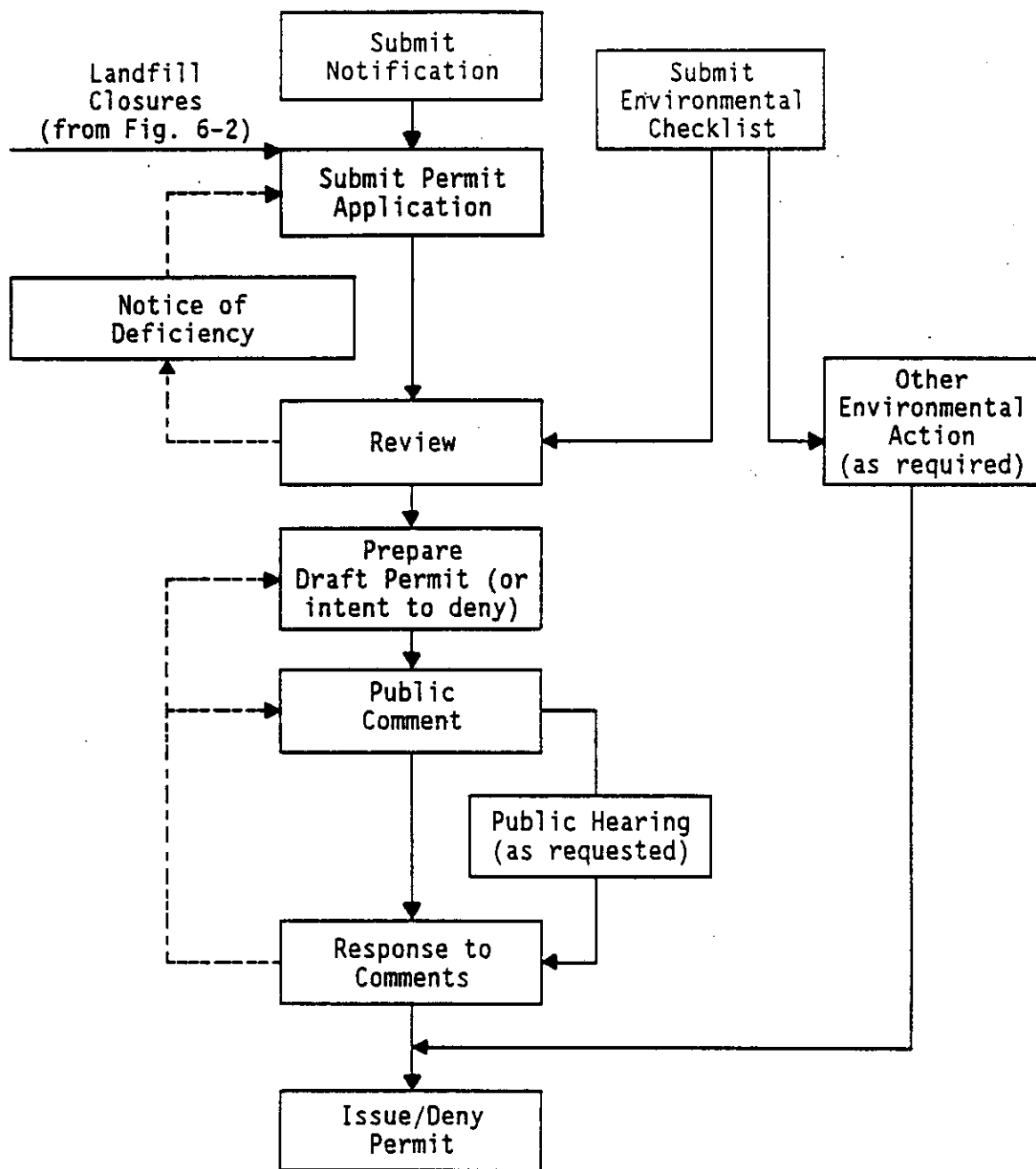


Figure 6-1. Permitting Process Flowchart.

Ecology will have the responsibility for drafting the permit or permit modifications for all TSD groups/units that are not assigned to operable units. When TSD groups/units are assigned to operable units, the lead regulatory agency, as described in Section 5.6, will be responsible for ensuring that the Part B permit application is complete, preparing the Notices of Deficiency (NOD) to the DOE, as necessary, and drafting the permit. The supporting regulatory agency will lend support to the process as needed.

The Part B permit application is a primary document, as defined in Section 9.1. The review procedures, as specified in Section 9.2.2, will be followed. In the event that issues cannot be resolved through the NOD process, the appropriate dispute resolution process can be invoked.

Section 3004(u) of RCRA requires that all solid waste management units be investigated as part of the permit process. The statute provides that the timing for investigation of such units may be in accordance with a schedule of compliance specified in the permit. The parties have addressed the statutory requirement through the preliminary identification and assignment of all known past-practice units to specific operable units (see Section 3.0). These operable units have been prioritized and scheduled for investigation in accordance with the work schedule (Appendix D). It is the intent of all parties that this requirement be met through incorporation of applicable portions of this action plan into the RCRA permit. This will include reference to specific schedules for completion of investigations and corrective actions.

Ecology, the EPA, and DOE will follow all current versions of applicable Federal and State statutes, regulations, guidance documents, and written policy determinations that pertain to the permitting process, including postclosure permits, for TSD groups/units. Public participation requirements for permitting TSD groups/units will be met and are addressed in Section 10.0.

### **6.3 TREATMENT, STORAGE, AND DISPOSAL CLOSURE PROCESS**

The DOE will follow applicable Federal and State statutes, regulations and guidance documents, and written policy determinations that pertain to the closure process for TSD groups/units.

The TSD units containing mixed waste will normally be closed with consideration of all hazardous substances, which includes radioactive constituents. Hazardous substances not addressed as part of the TSD closure may be addressed under CERCLA past-practice (CPP) authority in accordance with the process defined in Section 7.0.

The following are examples of when a unit may be closed without addressing all hazardous substances (e.g., radioactive waste).

- For treatment or storage units within a radioactive structure [e.g., the Plutonium/Uranium Extraction (PUREX) Plant] it may be possible to remove all hazardous wastes and "clean close" (see Section 6.3.1). The radioactive constituent would then remain for a future decontamination and decommissioning effort of the entire structure.

- For a land disposal unit being closed in conjunction with an operable unit, initial investigation may show that the unit no longer contains hazardous waste or constituents. Therefore, the unit may be "clean closed" with no physical closure action. Any remaining CERCLA-only materials would be addressed as part of the past-practice process as designated for that operable unit.

Figure 6-2 depicts a flowchart of the closure process for TSD units. Two types of closures are shown.

### 6.3.1 Clean Closure

In some cases, it may be possible to remove all hazardous wastes and constituents associated with a TSD unit and thereby achieve "clean closure." The process to complete clean closure of any unit will be carried out in accordance with all applicable requirements described in 173-303 WAC and 40 CFR 270.1. Any demonstration for clean closure of a disposal unit, or selected treatment or storage units as determined by the lead regulatory agency, must include documentation that groundwater and soils have not been adversely impacted by that TSD group/unit, as described in 173-303-645 WAC.

After completion of clean closure activities, a closed storage unit may be reused for generator accumulation (less than 90 day storage).

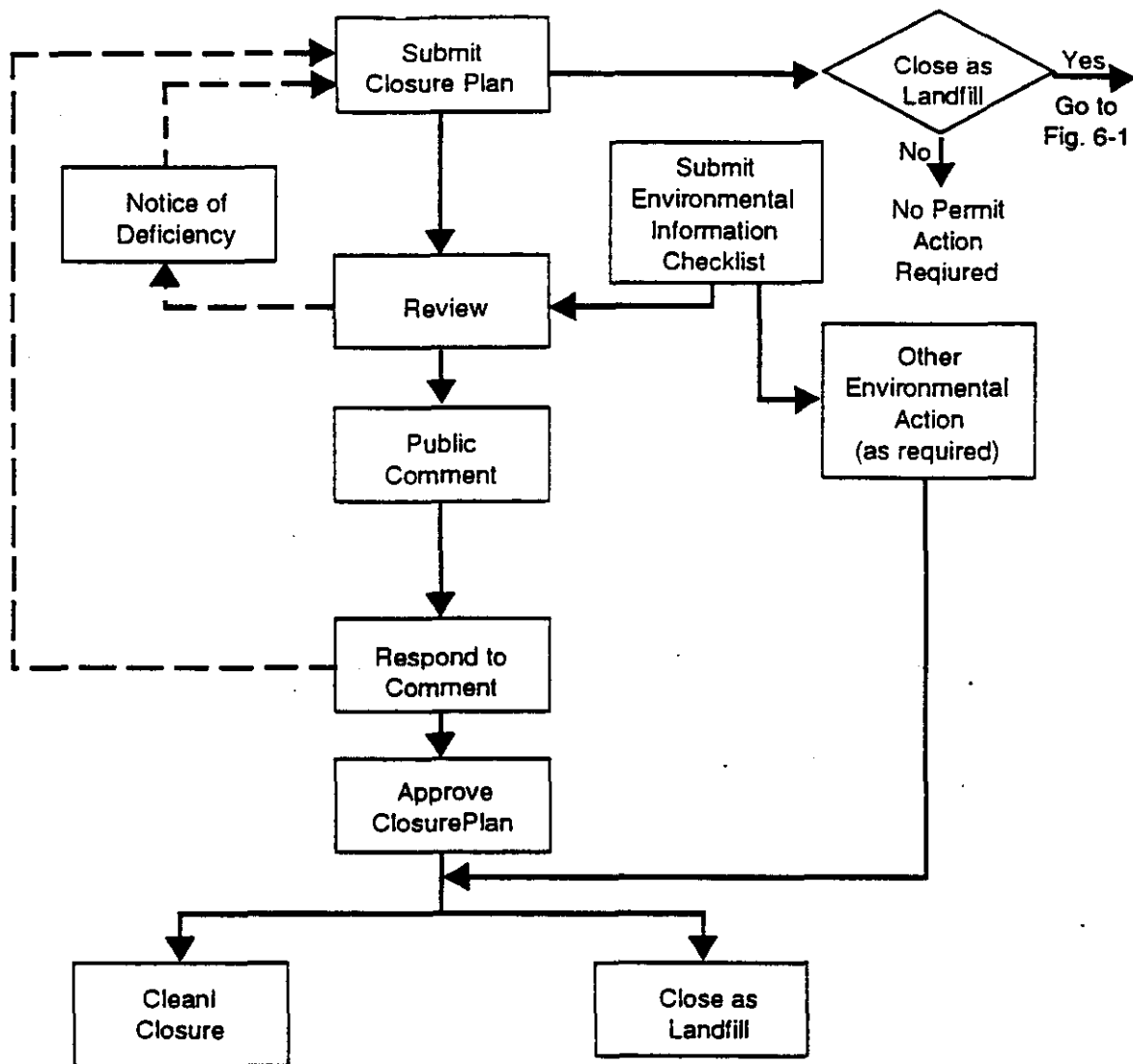
### 6.3.2 Closure as a Land Disposal Unit

If clean closure, as described above, cannot be achieved, the TSD unit will be closed as a land disposal unit. The process to close any unit as a land disposal unit will be carried out in accordance with all applicable requirements described at 173-303 WAC. In order to avoid duplication under CERCLA for mixed waste, the radionuclide component of the waste will be addressed as part of the closure action.

In the case of closure as a land disposal unit, a postclosure permit will be required. The postclosure permit will cover maintenance and inspection activities, groundwater monitoring requirements, and corrective actions, if necessary, that will occur during the postclosure period. The postclosure period will be specified as 30 years from the date of closure certification of each unit, but can be shortened or lengthened by Ecology at any time in accordance with 173-303-610 WAC. The closure plan will be submitted in conjunction with the Part B postclosure permit application, unless the parties agree otherwise. If a unit is to be closed as a land disposal unit prior to issuance of a permit for postclosure, an interim status postclosure plan will accompany the closure plan.

### 6.3.3 Procedural Closure

This is used for those units which were classified as being TSD units, but were never actually used to treat, store, or dispose of hazardous waste, including mixed waste, except as provided by 173-303-200 WAC or 173-303-802 WAC. This action requires that Ecology be notified in writing that the unit never handled hazardous wastes. Such information must include a signed certification from the DOE, using wording specified in 173-303-810(13) WAC. Ecology will review the information as appropriate (usually to include



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Figure 6-2. Closure Process Flowchart.



an inspection of the unit) and send a written concurrence or denial to the DOE. If denied, permitting and/or closure action would then proceed, or the dispute resolution process would be invoked.

#### 6.4 RESPONSE TO IMMINENT AND SUBSTANTIAL ENDANGERMENT CASES

The State of Washington Dangerous Waste Regulations, 173-303-960 WAC, addresses actions to abate an imminent and substantial endangerment to the health or the environment from the releases of dangerous or solid wastes. Ecology will require DOE to either take specific action to abate the danger or threat, or will require a specific submittal date for DOE to propose an abatement method. If the EPA (as lead regulatory agency) determines that such a situation exists at a TSD unit, a recommendation will be made to Ecology for appropriate action.

See Section 7.2.3 for information concerning responses to imminent and substantial endangerment cases at past-practice sites.

#### 6.5 QUALITY ASSURANCE

The level of quality assurance and quality control (QA/QC) for the collection, preservation, transportation, and analysis of each sample which is required for implementation of this Agreement shall be dependent upon the data quality objectives for the sample. Such data quality objectives shall be specified in RCRA closure plans, the RCRA permit, and any other relevant plans that may be used to describe sampling and analyses at RCRA TSD units.

The QA/QC requirements shall range from those necessary for non-laboratory field screening activities to those necessary to support a comprehensive laboratory analysis that will be used in final decision-making. This range of QA/QC options is included in the "Data Quality Strategy for Hanford Site Characterization" (as listed in Appendix F). This document is subject to approval by EPA and Ecology.

Based upon the data quality objectives, the DOE shall comply with EPA guidance documents for QA/QC and sampling and analysis activities which are taken to implement the Agreement. Such guidance includes:

- "Guidelines and Specifications for Preparing Quality Assurance Program Plans" (QAMS-004/80);
- "Interim Guidance and Specifications for Preparing Quality Assurance Project Plans" (QAMS-005/80);
- "Data Quality Objectives for Remedial Response Activities" (EPA/540/G-87/003 and 004); and
- "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (EPA/SW-846).

In some instances, RCRA TSD units are included in operable units and are scheduled for investigation and closure as part of the operable unit remedial action. DOE shall follow the provisions of Section 7.8 for QA/QC for sampling and analysis activities at these land disposal units.

In regard to QA requirements for construction of RCRA land disposal facilities, DOE shall comply with "Technical Guidance Document: Construction Quality Assurance for Land Disposal Facilities" (EPA/530-SW-86-031).

For analytical chemistry and radiological laboratories, the QA/QC plans must include the elements listed in "Guidance on Preparation of Laboratory Quality Assurance Plans" (as listed in Appendix F). DOE shall submit laboratory QA/QC plans to EPA and Ecology for review as secondary documents prior to use of that laboratory. In the event that DOE fails to demonstrate to the lead regulatory agency that data generated pursuant to this Agreement was obtained in accordance with the QA/QC requirements of this section, including laboratory QA/QC plans, DOE shall repeat sampling or analysis as required by the lead regulatory agency. Such action by the lead regulatory agency shall not preclude any other action which may be taken pursuant to this Agreement. For other data, Ecology or EPA may request DOE to provide QA/QC documentation. Any such data that does not meet the QA/QC standard required by this section shall be clearly flagged and noted to indicate this fact.

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## 7.0 PAST PRACTICES PROCESSES

### 7.1 INTRODUCTION

This section has the following five purposes.

- Describe the processes that are common to both CPP units and RPP units (Section 7.2).
- Describe the steps to be followed if the past-practice units at a given operable unit are to be managed through the CERCLA process (Section 7.3).
- Describe the steps to be followed if the past-practice units at a given operable unit are to be managed through the RPP unit process (Section 7.4).
- Describe the process for setting cleanup standards for any CPP or RPP remedial action (Section 7.5).
- Describe the role of other Federal agencies in the investigation and remedial action processes (Sections 7.6 and 7.7).

Approximately 1,400 waste management units have been identified within the boundaries of the 560-square mile Hanford Site. This includes approximately 1,000 past-practice units. Most past-practice units are located in two general geographic areas as identified by the DOE (the 100 and 200 Areas). Other past-practice units are located in the 300, 1100 and other areas of the Hanford Site.

The 100, 200, 300, and 1100 Areas were identified as aggregate areas for inclusion of the Hanford Site on the CERCLA NPL. Figure 7-1 reflects these geographic areas at the Hanford Site. Each of these areas has a unique environmental setting and waste disposal history. The four aggregate areas were proposed for inclusion on the NPL on June 24, 1988, and were placed on the NPL on November 3, 1989 (Federal Register, October 4, 1989). The remaining past-practice units from other areas have been assigned to operable units within one of the four aggregate areas for the purpose of investigation and subsequent action. Any future units that may be identified will also be assigned to operable units within an aggregate area.

Cleanup of past-practice units will be conducted pursuant to either the CERCLA process (Section 7.3) or RCRA process (Section 7.4). Figure 7-2 highlights the major steps involved in both the CPP and RPP programs and indicates how each of these steps is related to a comparable step in the other program. It shows that the steps of CERCLA are functionally equivalent to steps in the RPP program. Accordingly, the investigative process at any operable unit can proceed under either the CPP or the RPP program.

### 7.2 PRELIMINARY PROCESSES

Section 5.4 describes the rationale for managing operable units under either the CPP or the RPP category. The following processes apply to all past-practice units, regardless of whether they are classified as RPP or CPP units.

# The Hanford Site

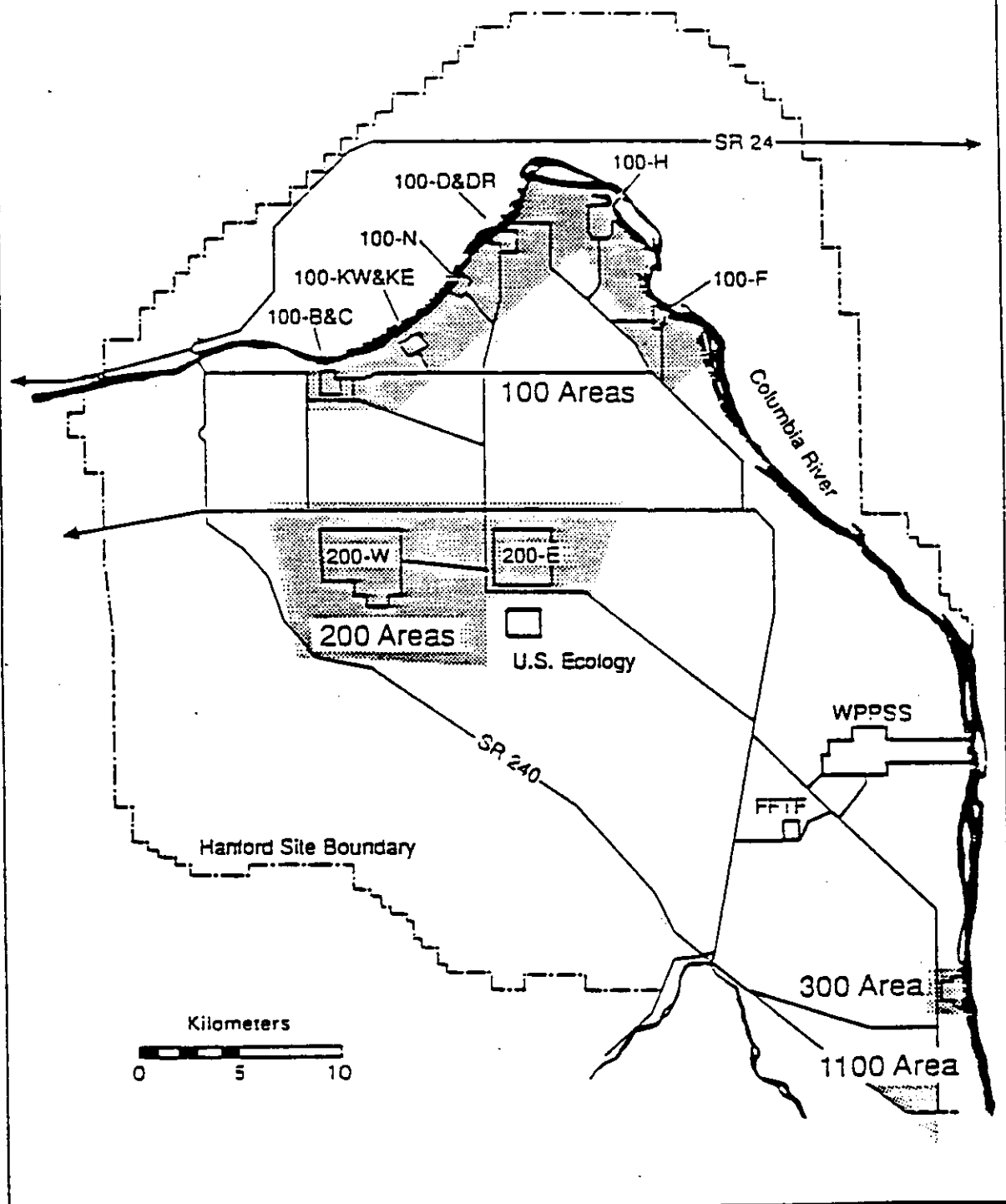
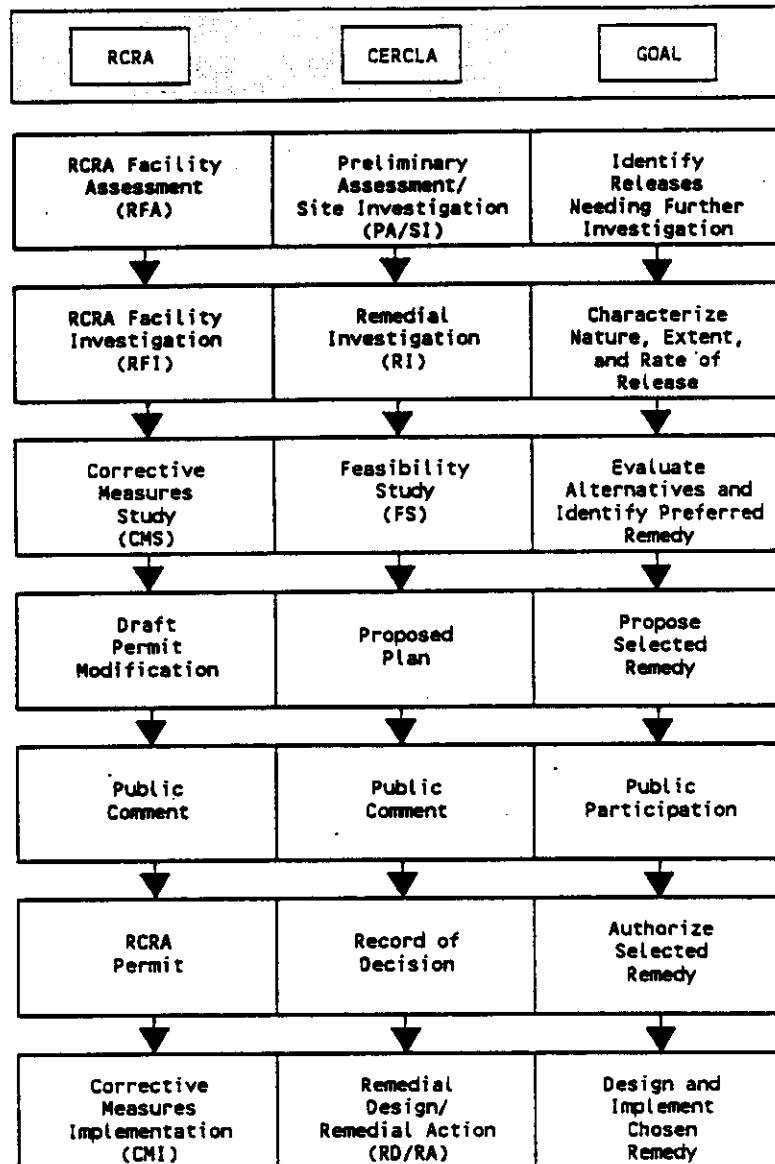


Figure 7-1. Aggregate Areas.



CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act

RCRA = Resource Conservation and Recovery Act

Note: Interim remedial actions or interim measures can be performed at any point in the remedial/corrective action process.

Figure 7-2. Comparison of Resource Conservation and Recovery Act Corrective Action and Comprehensive Environmental Response, Compensation, and Liability Act Remedial Processes.

### 7.2.1 Site-wide Scoping Activity

An ongoing scoping activity will be conducted on a site-wide basis to maintain a current listing of operable unit boundaries and priorities. The primary vehicle for documentation of this activity will be the Hanford Operable Units Report. The Hanford Operable Units Report, as described in Section 3.3, will be updated as additional information becomes available.

Although initial operable unit boundaries have been identified (Appendix C), the site-wide scoping activity may reveal additional or new information that could impact either the designation of individual units within operable units or the priority in which operable units will be managed. Any such changes will require the written concurrence of the project managers for the EPA, Ecology, and the DOE, in accordance with the modification procedures described in Section 12.2.

The site-wide scoping activities will not impact the schedule of any other activities that are shown on the work schedule (Appendix D).

### 7.2.2 Operable Unit Scoping Activity

The operable unit scoping activity will be used to support the initial planning phase for each RI/FS (or RFI/CMS). Such activity and planning will result in an overall management strategy for each operable unit. The DOE shall assemble and evaluate existing data and information about the individual waste management units and release sites within each operable unit. The data and information obtained during each operable unit scoping activity will be used to support the logic for the RI/FS (or RFI/CMS) work plan and, therefore, will be submitted as part of each work plan.

This scoping activity is not intended to be a mechanism for generation of new information except for site survey and screening activities described in Section 7.3.2, but a thorough and complete evaluation of existing data. The schedule for submittal of the work plans, as specified in the work schedule (Appendix D), allows time for inclusion of the scoping activity.

The following is a list of specific scoping activities that will be addressed in each RI/FS (RFI/CMS) work plan:

- Assessment of whether interim response actions (IRA) or interim measures (IM) may be necessary. Such assessments will be documented as part of the work plan and may result in IRA or IM proposals
- Assessment of available data and identification of additional data needs
- Identification of potential ARARs (see Section 7.5)
- Identification of potential remedial responses.

### 7.2.3 Response to Imminent and Substantial Endangerment Cases

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In the event that a situation is determined by the lead regulatory agency to represent an imminent and substantial endangerment to the public health or welfare or the environment because of an actual or threatened release of a hazardous substance or hazardous waste or solid waste at an operable unit, the lead regulatory agency may require the DOE to immediately initiate activities to abate the danger or threat. Both CERCLA and RCRA include provisions to quickly respond to such situations. Section 106 of CERCLA addresses imminent and substantial endangerments from releases of hazardous substances and Section 7003 of RCRA addresses imminent hazards from releases of solid or hazardous wastes. If the operable unit is being managed under the CPP procedures, abatement in accordance with Section 106 of CERCLA and the applicable sections of the National Contingency Plan (NCP) (40 CFR Part 300) is preferred. If the operable unit is being managed under the RPP procedures, abatement under the provisions of Section 7003 of RCRA will be preferred. If the operable unit has not yet been assigned to either the CPP or RPP process, the EPA and Ecology will jointly choose an authority to address the imminent and substantial endangerment.

The lead regulatory agency either shall specify the abatement method or shall specify a submittal date for DOE's proposed abatement method. In addition, the DOE may voluntarily submit a proposed method for abatement to the lead regulatory agency at any time. In cases involving a proposed method for abatement, the EPA must approve the DOE's proposal prior to initiation of field work. When Ecology is designated as the lead regulatory agency, Ecology shall recommend the selection of remedy to the EPA for approval. The final selection of remedy for an abatement action shall be consistent, to the extent practicable, with the final selection of remedial action (for CPP units) or corrective measures (for RPP units) anticipated for the unit(s).

To expedite the cleanup process, neither the specified abatement method nor the proposal for abatement will be subject to the public comment process, except as provided by Section 7003 of RCRA. However, the public will be kept informed of the status of the abatement process through other means as described in Section 10.0. After completion of all required abatement activity, the routine RI/FS or RFI/CMS process will be implemented, or continued, in accordance with the work schedule (Appendix D). The procedures specified in Section 7.3 or 7.4, respectively, will be followed.

### 7.2.4 Interim Response Action and Interim Measure Processes

If data or information acquired at any time indicate that an expedited response is needed or appropriate because of an actual or threatened release from a past-practice unit, the lead regulatory agency may require the DOE to submit a proposal for an expedited response at that unit. In addition, the DOE may submit such a proposal at any time, without request from the lead regulatory agency.

Both CERCLA and RCRA include provisions for expedited responses. These expedited responses will be reserved for situations in which an expedited response is determined to be warranted by the lead regulatory agency. An IRA refers to the CERCLA process and an IM refers to the RCRA process. The IRA or

IM process will be used in cases where early remediation will prevent the potential for an imminent and substantial endangerment or an imminent hazard to develop. It may also be used in cases where a single unit within an operable unit is a high priority for action, but the overall priority for the operable unit is low. In this way, a specific unit or release at an operable unit can be addressed on an expedited schedule, when warranted.

In addition to the CERCLA and RCRA authorities, Section 2 of Executive Order 12580, dated January 29, 1987, allows the DOE to implement removal actions in circumstances other than emergencies. To the extent that a removal action taken by the DOE under Executive Order 12580 could be inconsistent with the CERCLA or RCRA processes, or if such action could alter the schedules as set forth in Appendix D, the concurrence of all project managers shall be required prior to initiation of field work.

If the operable unit is being managed under the CPP procedures, an IRA proposal shall be submitted by the DOE to the lead regulatory agency, and the IRA shall be conducted in accordance with 40 CFR Part 300 Subpart E. If the operable unit is being managed under the RPP procedures, the IM proposal shall be submitted to the lead regulatory agency, and the IM shall be conducted in accordance with applicable regulations. If the operable unit has not yet been assigned to either the CPP or RPP process, the EPA and Ecology will jointly choose an authority to address the expedited response.

Any proposal for an IRA or an IM must be approved by the EPA prior to initiation of field work. When Ecology is designated as the lead regulatory agency, Ecology shall recommend the selection of remedy to the EPA for approval. The selection of remedy for an IRA or an IM shall be consistent, to the extent practicable, with anticipated alternatives for final selection of remedial action (for CPP units) or corrective measures (for RPP units).

Public comment on the IRA proposal, as well as other public participation opportunities, will be provided as described in Section 10.0.

### **7.3 COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT PAST-PRACTICE UNIT PROCESS**

The purpose of this subsection is to provide an overview of the CPP unit process to be used at the Hanford Site to initiate effective, timely, and environmentally sound cleanup of operable units handled under CERCLA. This includes a description of the RI/FS process, followed by a short discussion of the remedial design (RD), remedial action (RA), and operation and maintenance (O&M) phases.

#### **7.3.1 Preliminary Assessment/Site Inspection**

The Preliminary Assessment/Site Inspection (PA/SI) is used as an initial screening step to determine whether a site should be nominated for the CERCLA NPL. For the Hanford Site, the information necessary to make that determination was provided to the EPA in 1987 by the DOE. The EPA determined that this information was functionally equivalent to a PA/SI. Based on that information, the Hanford Site was ranked and then nominated for inclusion on NPL on June 24, 1988 (Federal Register Vol. 53, No. 122, p. 23988). The four aggregate areas of the Hanford Site were officially placed on the NPL effective November 3, 1989 (Federal Register Vol. 54, No. 191, p. 41015).



Therefore, there is no need to continue a PA/SI activity for the Hanford Site. Efforts will proceed directly to the scoping activities previously discussed and the RI/FS process. Figure 7-3 shows the normal sequence of events that occur during the RI/FS process.

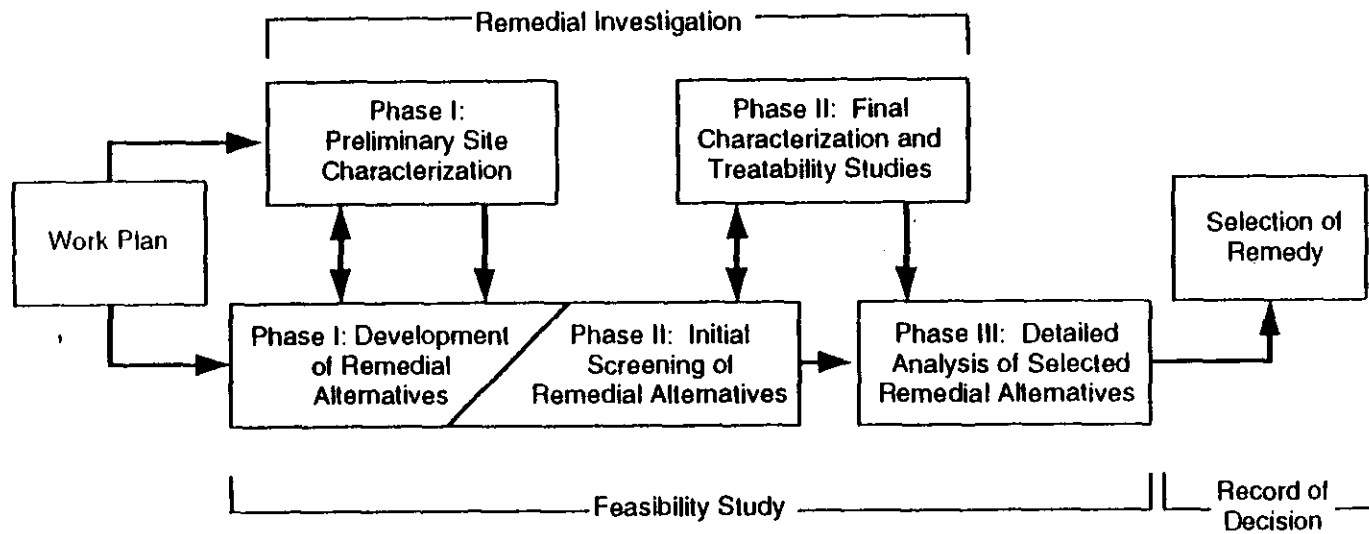
### 7.3.2 Remedial Investigation/Feasibility Study Work Plan for Each Operable Unit

The RI/FS work plan is a primary document, as described in Section 9.0. The lead regulatory agency will provide comments on each RI/FS work plan that is submitted by the DOE. The RI/FS work plan will be made available for public comment for a period of 30 days, in accordance with the procedures described in Section 10.0. On a case-by-case basis, the unit managers may agree to extend the comment period to 45 days. Following public comment, the lead regulatory agency will require the DOE to make appropriate changes to the RI/FS work plan, based on review of public comments received, and will approve the work plan. At that time, the work schedule (Appendix D) may need to be modified to accurately reflect the RI/FS work plan schedule. Such modification will be made by the project managers in accordance with the procedures described in Section 12.0. At that time, the EPA and Ecology will publish the RI/FS schedule, in accordance with CERCLA Section 120(e)(1) and as specified in Article XVII of the Agreement. As additional information becomes available during the RI/FS process, the RI/FS work plan may be revised.

The RI/FS work plan will include or reference seven interrelated components as they pertain specifically to RI/FS activities at any given operable unit. These components, prepared in accordance with current EPA guidance documents, include the following:

- Technology
- Quality assurance/quality control
- Project management
- Sampling and analysis
- Data management
- Health and safety
- Community relations.

Every effort will be made to standardize these across RI/FS work plans to minimize the time and resources required for preparation and review. The community relations component will be prepared and issued as a separate formal plan as described in Section 10.0 and will then be referenced in each RI/FS work plan.



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Figure 7-3. Overview of the Remedial Investigation/Feasibility Study Process.

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The following site survey and screening activities may precede submittal of the RI/FS work plan, and are a continuation of the operable unit scoping activity described in Section 7.2.2:

- Survey location of sites
- Surface radiation
- Surface geophysical surveys
- Air sampling
- Soil gas surveys
- Biotic surveillance.

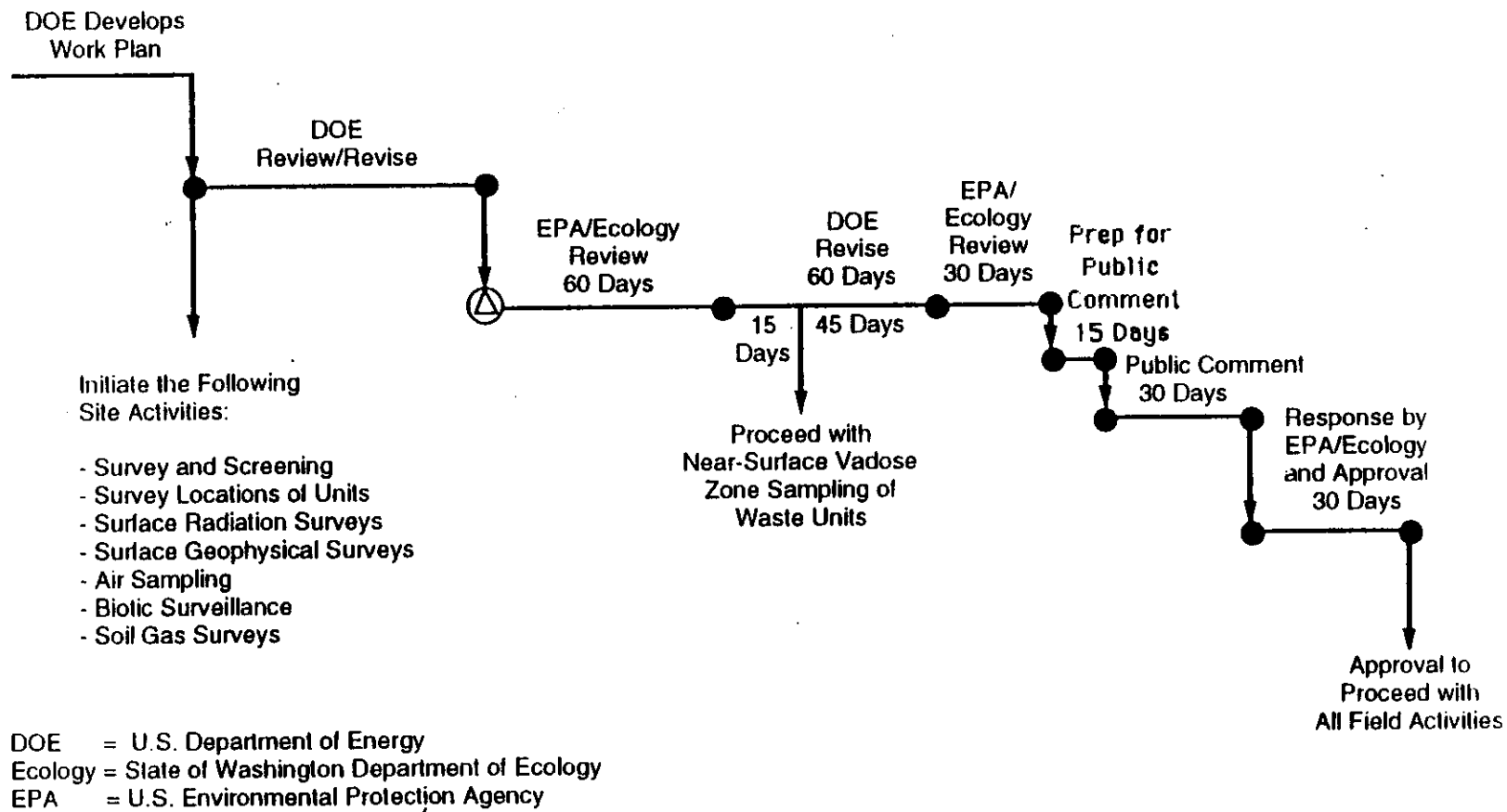
This will allow for a quicker start of characterization activities upon approval of the RI/FS work plan. The results of the site survey and screening activities will be factored into the work plan, as appropriate, during the review and approval process. In addition, to further expedite the process, near-surface vadose zone sampling activities may commence after 2 weeks following the receipt of comments from the lead regulatory agency on the initial draft of the RI/FS work plan if comments from the lead regulatory agency regarding vadose zone sampling have been resolved. Following the public comment period on the work plan, the lead regulatory agency may require the DOE to modify or add to these preliminary activities as necessary to resolve any issues raised by the public. Figure 7-4 depicts the normal review and approval cycle, including public comment, for primary documents (see Section 9.0) as applied to the RI/FS work plans. Figure 7-4 also applies to RFI/CMS work plans, which are discussed in Section 7.4.2.

### 7.3.3 Remedial Investigation--Phase I

The first phase of the remedial investigation (RI) will focus on defining the nature and extent of contamination through field sampling and laboratory analysis. This will include characterization of waste types, migration routes, volume, and concentration ranges. This information will be used to further develop cleanup requirements.

The DOE will initiate those activities necessary to characterize and assess risks, routes of exposure, fate and transport of contaminants, and potential receptors. It is anticipated that because of the limited data available during this phase to adequately assess risks, including environmental pathways and expected exposure levels, this analysis will be further developed during the feasibility studies (FS).

In some cases, treatability investigations at an operable unit will involve minimal activity. In other cases, treatability investigations at a previously investigated operable unit may be used at other operable units whenever warranted by site-specific conditions. When these situations exist, it is possible to expedite the RI/FS process by combining the RI Phase I



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Figure 7-4. Remedial Investigation/Feasibility Study (Resource Conservation and Recovery Act Facility Investigation/Corrective Measures Study) Work Plan Review and Approval.

activity with the RI Phase II activity. Any decision to combine the RI Phases I and II must be agreed to in writing by the project manager of the lead regulatory agency, in accordance with the procedures described in Section 12.2, unless it was agreed to during the initial approval of the RI/FS work plan.

The actual schedule for conducting the RI Phase I will be specified for each operable unit in the work schedule (Appendix D). The RI Phase I report is a secondary document, as described in Section 9.0. In cases where the RI Phases I and II have been combined, a RI Phases I and II report shall be prepared by the DOE and submitted to the lead regulatory agency as a primary document, as described in Section 9.0.

#### 7.3.4 Feasibility Study--Phase I

The FS Phase I will be conducted by the DOE for the purpose of developing an array of alternatives to be considered for each operable unit. The DOE will develop the alternatives for remediation by assembling combinations of technologies, and the media to which the technologies could be applied, into alternatives. The alternatives will address all contamination at each operable unit.

The FS Phase I process will begin during the RI Phase I process when sufficient data are available. Such data will consist of analytical data obtained during the RI, as well as historical information regarding waste management units at the operable unit.

Because of the direct relationship between FS Phase I (development of alternatives) and FS Phase II (screening of alternatives--Section 7.3.5), the two phases will be conducted concurrently. This approach should save several months in the RI/FS process, without sacrificing quality of work. Since Phases I and II of the FS will be finished at the same time, the information from both phases will be submitted to the lead regulatory agency in a single FS Phases I and II report.

#### 7.3.5 Feasibility Study--Phase II

The FS Phase II will be a screening step to reduce the number of treatment alternatives for further analysis while reserving a range of options. Screening will be accomplished by considering the alternatives based on effectiveness, implementability, and cost factors. Cost may be used as a factor when comparing alternatives that achieve acceptable standards of performance.

Innovative technologies will be carried through the screening process if they offer the potential for better treatment performance or implementability, fewer or less adverse impacts than other available technologies, or lower costs than demonstrated technologies with comparable environmental results.

As stated in Section 7.3.4, Phases I and II of the FS will be conducted concurrently. Therefore, the FS Phase II will begin as soon as sufficient data from the RI Phase I is obtained. The actual schedule for conducting the FS Phases I and II will be specified for each operable unit in the work schedule (Appendix D). The FS Phases I and II report, is a primary document as described in Section 9.0.

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### 7.3.6 Remedial Investigation--Phase II

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This second phase of the RI will focus on collecting data sufficient to substantiate a decision for remedy selection. A supplemental work plan to the RI/FS work plan will be prepared to cover the RI Phase II activities. This work plan will be placed in the Public Information Repositories. After a literature search is conducted to consider the applicability of various remediation alternatives, treatability investigations may be performed for particular technologies. Additional field data will be collected as needed to further assess alternatives. Treatability investigation work plans will be submitted by DOE to EPA and Ecology when the investigation is related to a specific operable unit per the RI/FS work plan. When a proposed treatability investigation is not specific to an operable unit, the work plan will be submitted to EPA and Ecology per the work schedule in Appendix D. The lead regulatory agency shall determine on a case-by-case basis whether a treatability investigation work plan is a primary document or a secondary document (see Section 9.1) during development of the applicable RI/FS (or RFI/CMS) work plan. For those treatability investigation work plans developed outside of a specific operable unit, both EPA and Ecology shall determine if it is a primary document or secondary document during development of the work schedule. These determinations will be based on the scope, complexity, and significance of the proposed investigation.

Upon completion of the treatability investigation, DOE shall submit a treatability investigation report to EPA and Ecology, documenting the findings of the investigation and applicability to the remedial action project. The treatability investigation report is a secondary document (see Section 9.1).

The actual schedule for conducting the RI Phase II will be specified for each operable unit in the work schedule (Appendix D). The RI Phase II report is a primary document as described in Section 9.0. Where the RI Phase I and Phase II activities have been combined (see Section 7.3.3), the resulting RI Phases I and II report would also be a primary document.

### 7.3.7 Feasibility Study--Phase III and Proposed Plan

The treatment alternatives passing through the initial screening phases will be analyzed in further detail against a range of factors and compared to one another during the FS Phase III. This final screening process will begin once the FS Phases I and II report is approved by the lead regulatory agency.

The determination for the preferred alternative will be made based on the following general criteria:

- Does the alternative protect human health and the environment and attain ARARs
- Does the alternative significantly and permanently reduce the toxicity, mobility, and volume of hazardous constituents
- Is the alternative technically feasible and reliable.

In addition, the costs of construction and the long-term costs of operation and maintenance will be considered.

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The actual schedule for conducting the FS Phase III will be specified for each operable unit in the work schedule (Appendix D). A FS Phase III report will be prepared by the DOE documenting the results of the RI/FS. The FS Phase III report is a primary document as described in Section 9.0.

With consideration of all information generated through the RI/FS process, the DOE shall prepare a proposed plan. This proposed plan is required by CERCLA Section 117(a). The proposed plan must describe an analysis of the feasible alternatives and clearly state why the proposed remedy is the most appropriate for the operable unit, based on written EPA guidance and criteria. Once the lead regulatory agency has concurred on the proposed plan, and the FS Phase III report, the documents will be made available for public review and comment in accordance with the procedures described in Section 10.0. Public review of the proposed plan will provide opportunity for consideration of two additional criteria in preparation of the record of decision. These criteria are State and community preference or concerns about the proposed alternatives.

#### 7.3.8 Record of Decision

After the public comment period on the FS Phase III report and the proposed plan has closed, the record of decision (ROD) process will begin. The ROD will be prepared by the lead regulatory agency and will describe the decision making process for remedy selection, and summarize the alternatives developed, screened, and evaluated in accordance with CERCLA and the NCP. The lead regulatory agency is responsible for reviewing the comments received and will prepare a responsiveness summary that will accompany the ROD. Although all of the RI/FS and preliminary determinations through the process of drafting the ROD will be the responsibility of the lead regulatory agency for a given operable unit, the ROD must be signed and published in the Federal Register by the EPA. The ROD will become part of the administrative record for each operable unit. The lead regulatory agency shall continue its role after issuance of the ROD, including oversight of the remedial design and remedial action phases, as described below.

#### 7.3.9 Remedial Design Phase

Following issuance of the ROD, the remedial design (RD) phase will be initiated in accordance with a schedule agreed to by the project managers. Since any necessary treatability investigations have been performed during the RI Phase II, no additional investigations will be necessary, unless required by the lead regulatory agency. A number of items will be completed during the RD phase, including but not limited to the following:

- Completion of design drawings
- Specification of materials of construction
- Specification of construction procedures
- Specification of all constraints and requirements (e.g., legal)
- Development of construction budget estimate
- Preparation of all necessary and supporting documents.

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An RD report will be prepared that includes the designs and schedules for construction of any remediation facility and development of support facilities (lab services, etc.). The RD report is a primary document as described in Section 9.0. The schedule for conducting the RD phase will be specified for each operable unit in the work schedule (Appendix D).

#### 7.3.10 Remedial Action Phase

The remedial action (RA) phase will be initiated in accordance with a schedule agreed to by the project managers. The RA phase is the implementation of the detailed actions developed under the RD. The RA will include construction of any support facility, as specified in the RD report, as well as operation of the facility to effect the selected RA at that operable unit.

An RA work plan will be developed for each operable unit detailing the plans for RA. The RA work plan is a primary document as described in Section 9.0. The schedule for conducting the RA phase will be specified for each operable unit in the work schedule (Appendix D).

Upon satisfactory completion of the RA phase for a given operable unit, the lead regulatory agency shall issue a certificate of completion to the DOE for that operable unit. At the discretion of the lead regulatory agency, a certificate of completion may be issued for completion of a portion of the RA phase for an operable unit.

#### 7.3.11 Operation and Maintenance

The operation and maintenance (O&M) phase will be initiated at each operable unit when the RA phase has been completed. This phase will include inspections and monitoring as described in the O&M plan. In all cases where waste or contamination is left in place as part of the RA, the O&M phase is expected to be a long-term activity. Where waste or contamination is left in place, the operable unit will be evaluated by the lead regulatory agency at least every 5 years during the O&M phase to determine whether continued O&M activity is indicated or further RA is required. The lead regulatory agency may conduct more frequent evaluations should data indicate this is necessary to ensure effective implementation of the RA. All O&M data and records obtained to that date, along with any additional information provided by the DOE, will be used in that evaluation.

In cases where all waste or contamination is removed or destroyed, a short period for the O&M phase for specific units within an operable unit may be specified by the lead regulatory agency. The lead regulatory agency may, where appropriate, allow for the O&M phase to be terminated for certain units within an operable unit while requiring O&M to be continued at other units. In these cases, certain units may be considered for delisting in accordance with the NCP, after the O&M phase has been completed.

The O&M plan is a primary document as described in Section 9.0. The schedule for conducting significant steps described in the O&M plan are specified for each operable unit in the work schedule (Appendix D).



#### **7.4 RESOURCE CONSERVATION AND RECOVERY ACT PAST-PRACTICE UNIT PROCESS**

The RPP processes are the subject of this Section. These authorities were introduced and generally described in Section 5.2. The RCRA Sections 3004(u), 3004(v), and 3008(h) became effective when Congress reauthorized RCRA on November 8, 1984. This reauthorization is known as the Hazardous and Solid Waste Amendments of 1984 (HSWA).

##### **7.4.1 Resource Conservation and Recovery Act Facility Assessment**

For those units that are defined as RPP units, (see definition in Section 7.1), the lead regulatory agency for an operable unit may require the DOE to conduct a RCRA facility assessment (RFA) of all or some of the RPP units within that operable unit. The need for an RFA is based on whether sufficient knowledge exists to determine if an RFI is required. Based on the results of the RFA, the lead regulatory agency may require additional information from the DOE, or it may determine that no further investigation or corrective action is required for any of the RPP units within the operable unit. Where Ecology is the lead regulatory agency prior to HSWA delegation, the project manager for the EPA must agree, in writing, before any individual unit is dismissed from further investigation requirements through the RFA. The project manager for the lead regulatory agency for that operable unit may direct the DOE to conduct a RFI based on results of the RFA.

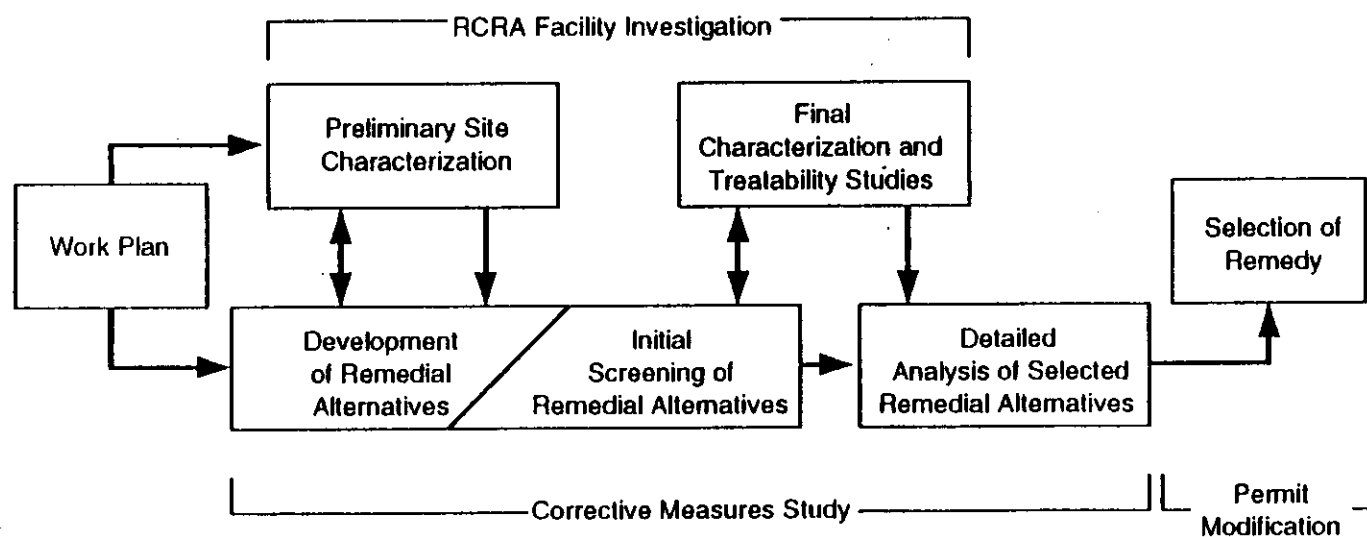
The RFA will be developed in accordance with current applicable regulations, guidance documents, and written policy available at the time the RFA is begun. An RFA report will be prepared documenting the results of the RFA. The RFA report is a primary document as described in Section 9.0. If the lead regulatory agency determines that further investigation is necessary, the project manager for the lead regulatory agency will direct the DOE to prepare an RFI report, as described below.

In some cases, sufficient information may already exist that indicates that further investigation will be required. In these cases the RFA process will be bypassed and effort will be focused on the RFI/CMS. Figure 7-5 shows the normal sequence of events that occur during the RFI/CMS process.

##### **7.4.2 Resource Conservation and Recovery Act Facility Investigation**

Each RCRA Facility Investigation (RFI) will address all units within a specific operable unit, as identified in the RFI/CMS work plan. The RFI/CMS work plan will be functionally equivalent to an RI/FS work plan (see Section 7.3.2). Timing for submittal of the work plan will be in accordance with the work schedule (Appendix D).

An RFI report will be prepared by the DOE, and it will document the results of the RFI. The RFI report is a primary document as described in Section 9.0. The schedule for conducting the RFI will be specified for each operable unit in the work schedule (Appendix D). The parties agree that the information obtained through the RFI must be functionally equivalent to information gathered in the CERCLA process through the RI Phases I and II, as described in Sections 7.3.3 and 7.3.6.



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Figure 7-5. Overview of the RCRA Facility Investigation/Corrective Measures Study Process.

Based on the results of the RFI, the lead regulatory agency may determine that no further investigation or corrective action is required for each RPP unit in an operable unit. Where Ecology is the lead regulatory agency prior to the HSWA delegation, the project manager for the EPA must agree, in writing, before any individual unit is dismissed from further investigation requirements through the RFI. The project manager from the lead regulatory agency for that operable unit may direct the DOE to conduct a CMS based on results of the RFI.

#### 7.4.3 Corrective Measures Study

A Corrective Measures Study (CMS) shall be prepared by the DOE and will include an identification and development of the corrective measure alternative(s), an evaluation of these alternatives, and a justification for the recommended alternative. The CMS will include development of a cost estimate for each alternative considered.

A CMS report documenting the results of the study will be prepared by the DOE. The CMS report is a primary document as described in Section 9.0. The schedule for conducting the CMS will be specified for each operable unit in the work schedule (Appendix D). The CMS report will become the basis for revision of the RCRA permit through the modification or revocation and reissuance processes described in Section 6.2. The parties agree that the information obtained through the CMS must be functionally equivalent to information gathered in the CERCLA process through the FS Phases I, II, and III as described in Sections 7.3.4, 7.3.5, and 7.3.7.

The lead regulatory agency for the operable unit shall continue its oversight role through the corrective measures implementation (CMI) phase and through any long-term monitoring or maintenance phase that is specified in the CMI work plan.

#### 7.4.4 Corrective Measures Implementation

The DOE will initiate, maintain progress toward completion of, and complete any necessary corrective action for all RPP units within each operable unit in accordance with the CMI work plan. This will be done in accordance with current applicable regulations, guidance documents, and written policy available at any time during the corrective action process. It is agreed by the parties that the content of the CMI work plan will be considered to be functionally equivalent to that of the RA work plan described in Section 7.3.10.

The CMI work plan and the corrective measures design (CMD) report, which are produced as part of the CMI phase, are primary documents as described in Section 9.0. The schedule for developing the CMI work plan and conducting the CMI will be specified for each operable unit in the work schedule (Appendix D). The CMI phase will be conducted in accordance with the schedule of compliance specified in the RCRA permit and the work schedule (Appendix D).

Upon satisfactory completion of the CMI phase as described in the CMI work plan for a given operable unit, the lead regulatory agency shall issue a certificate of completion to the DOE for that operable unit. At the discretion of the lead regulatory agency, a certificate of completion may be issued for completion of a portion of the CMI phase for an operable unit.

#### 7.4.5 Offsite Releases and Corrective Action

In the event that hazardous constituents or contamination from a landfill unit, surface impoundment, or waste pile is found to have migrated beyond the boundaries of the Hanford Site, the lead regulatory agency may require that corrective action for such contamination be addressed in accordance with RCRA Section 3004(v). The RCRA Section 3004(v) corrective action authority will be implemented through a schedule of compliance. The DOE shall make every reasonable effort to gain access to investigate and remediate offsite contamination. The DOE will document attempts to attain offsite access for investigative work and corrective action in such cases, in accordance with the access provisions as specified in Article XXXVII of the Agreement. Where necessary to accomplish offsite RA, such releases may be addressed by the lead regulatory agency under CERCLA authority.

The DOE will initiate, maintain progress toward completion of, and complete any offsite corrective action required by the EPA under the authority of RCRA Section 3004(v), in accordance with the time frames specified in the work schedule (Appendix D) and in accordance with current applicable regulations, guidance documents, and written policy available at any time during the corrective action process.

#### 7.5 CLEANUP REQUIREMENTS

In accordance with Section 121(d) of CERCLA, the DOE will comply with all ARARs when hazardous substances, pollutants, or contaminants are to remain onsite as part of RAs. These requirements include cleanup standards, standards of control, and other substantive environmental protection requirements and criteria for hazardous substances as specified under Federal or State laws and regulations. The parties intend that ARARs, as appropriate, will apply at units being managed under the RPP program at the Hanford Site to ensure continuity between the RCRA and CERCLA authorities.

"Applicable requirements" are those cleanup standards, standards of control, and other substantive environmental protection requirements, criteria, or limitations promulgated under Federal or State law. These requirements specifically address a hazardous substance, pollutant, contaminant, hazardous waste, hazardous constituent, RA, location, or other circumstance at the Hanford Site.

"Relevant and appropriate requirements" are those which do not meet the definition of applicable requirements, yet pertain to problems or situations similar to those encountered in the cleanup effort at the Hanford Site. Such requirements must be suited to the unit under consideration and must be both relevant and appropriate to the situation.

The ARARs are classified into three general categories as follows:

- Ambient or chemical-specific requirements. These are established numeric criteria for various constituents. These criteria are usually set from risk-based or health-based values or methodologies

- Performance, design, or other action-specific requirements. These are usually technology or activity-based requirements or limitations on actions taken with respect to a given hazardous substance or hazardous constituent
- Location-specific requirements. These are restrictions placed on the concentration of hazardous substances or hazardous constituents or on the conduct of activities solely because they occur in special locations.

In addition to ARARs, certain non-promulgated Federal or State criteria, advisories, guidance, and proposed standards may be used to establish cleanup standards. These "to-be-considered" criteria can be imposed if necessary to assure protection of human health and the environment but are not necessarily legally binding. These criteria will be specified by the lead regulatory agency in cases where an ARAR does not exist, or in cases where the lead regulatory agency does not believe the ARAR is protective of human health and the environment given the site specific conditions.

For units which are selected for abatement actions or interim actions, as described in Sections 7.2.3 and 7.2.4, ARARs will be applied, where appropriate, recognizing that these units will later be subject to ARARs during the final remedial or corrective action process.

Compliance with an ARAR may be waived in certain circumstances, as specified in current EPA guidance on cleanup requirements. Waivers will be limited to the following situations:

- Cases in which compliance with an ARAR will result in a greater risk to human health and the environment than an alternative option.
- Cases in which compliance with an ARAR is technically impracticable from an engineering perspective.
- Cases in which alternative treatment methods to those specified as ARARs have been shown to result in equivalent standards of performance.
- With respect to a State standard, requirement, criteria, or limitation, the State has not consistently applied procedures to establish a standard, requirement or criteria or demonstrated the intention to consistently apply the standard, requirement, criteria, or limitation in similar circumstances at other RAs.

Federal statutes, regulations, and "to-be-considered" criteria from which cleanup requirements will be developed are included in the current EPA guidance document, "CERCLA Compliance with Other Laws Manual." The following list identifies the key state statutes and regulations from which cleanup requirements will be developed for the Hanford Site. This list is not intended to be inclusive; other standards may be applicable on a case-by-case basis. In addition, this list can be expanded as new State statutes and regulations become effective:

- Washington State Environmental Policy Act--Chapter 43.21C RCW, and implementing regulations;

Guidelines Interpreting and Implementing the  
State Environmental Policy Act--197-11 WAC

- Water Well Construction Act--Chapter 18.104 RCW, and implementing regulations;

Minimum Standards for Construction and  
Maintenance of Water Wells--173-160 WAC

- Washington Clean Air Act--Chapter 70.94 RCW
- Solid Waste Management, Recovery and Recycling Act--Chapter 70.95 RCW, and implementing regulations;

Minimum Functional Standards for Solid Waste  
Handling--173-304 WAC

- Nuclear Energy and Radiation Act--Chapter 70.98 RCW, and implementing regulations;

Standards for Protection Against Radiation--  
402-24 WAC

Licensing Requirements for Land Disposal of  
Radioactive Waste--402-61 WAC

Monitoring and Enforcement of Air Quality and  
Emission Standards for Radionuclides--402-80 WAC

- Hazardous Waste Management--Chapter 70.105 RCW, and implementing regulations;

Dangerous Waste Regulations--173-303 WAC

- Model Toxics Control Act--Chapter 70.105D RCW, and implementing regulations;

Model Toxics Control Act Cleanup Regulation--173-340 WAC

- Washington State Water Code--Chapter 90.03 RCW
- Regulation of Public Groundwaters--Chapter 90.44 RCW
- Water Pollution Control Act--Chapter 90.48 RCW, and implementing regulations;

Water Quality Standards for Water of the State  
of Washington--173-201 WAC

State Waste Discharge Program--173-216 WAC

Underground Injection Control Program--173-218  
WAC

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National Pollution Discharge Elimination System  
Permit Program--173-220 WAC

- Water Resources Act of 1971--Chapter 90.54 RCW
- Shoreline Management Act--Chapter 90.58 RCW and implementing regulations, 173-14 through 173-22 WAC

The DOE shall use the Federal and State sources of information, as mentioned above, in developing proposed ARARs during the RI/FS (or RFI/CMS) process. The detailed documentation of ARARs shall be provided in an appendix to the FS Phase III Report (or CMS report).

The lead regulatory agency for each CERCLA operable unit shall prepare a summary of the rationale for selection of ARARs for the ROD. The lead regulatory agency of each RPP operable unit shall prepare a summary of the rationale for selection of the ARARs for the fact sheet that will accompany the CMS report (including permit modification or permit revocation and reissuance, as applicable).

In the event that new standards are developed subsequent to initiation of RA at any operable unit, and these standards result in revised ARARs or "to-be-considered" criteria, these new standards will be considered by the lead regulatory agency as part of the review conducted at least every five years under Section 121(c) of CERCLA.

## 7.6 NATURAL RESOURCE TRUSTEESHIPS

Section 107 of CERCLA imposes liability for damages for injury to, destruction of, or loss of natural resources. It also provides for the designation of Federal and State trustees, who shall be responsible for, among other things, the assessment of damages for injury to, destruction of, or loss of natural resources. Current regulations concerning such trustees are in the NCP, 40 CFR Part 300, Subpart G.

The DOE shall notify appropriate Federal and State natural resource trustees as required by section 104(b)(2) of CERCLA and Section 2(e)(2) of Executive Order 12580.

In addition to DOE, the relevant Federal trustees for the Hanford Site are the U.S. Department of Commerce and the U.S. Department of the Interior (DOI). Their respective roles are described below.

### 7.6.1 National Oceanic and Atmospheric Administration

The National Oceanic and Atmospheric Administration (NOAA) acts on behalf of the Secretary of Commerce as a Federal trustee for living and nonliving natural resources in coastal and marine areas. Resources of concern to the NOAA include all life stages, wherever they occur, of fishery resources of the exclusive economic zone and continental shelf and anadromous species throughout their ranges. For resources in coastal waters and anadromous fish streams, the NOAA may be a co-trustee with the DOI, other Federal land management agencies, and the affected States, and Indian Tribes. Chinook,

coho, and sockeye salmon, as well as steelhead trout, are the anadromous species that utilize the Hanford Reach for spawning, rearing, foraging, and as a migratory corridor.

Under an existing interagency agreement with the EPA, the NOAA will provide a Preliminary Natural Resource Survey (PNRS) to the EPA by December 31, 1988, detailing trust species of concern at the four aggregate areas at the Hanford Site (the 100, 200, 300, and 1100 Areas). The NOAA will also provide technical review, at the operable unit level, of RI/FS work plans, RI reports, FS reports, RD reports, and RA work plans, as appropriate. These technical reviews will be done to ensure that potential impacts to anadromous fish in the Hanford Reach are addressed in the CERCLA process. The NOAA will coordinate with other natural resource trustees, as appropriate, to preclude duplication of effort. The DOE will provide the NOAA with a copy of documents listed above at the time of submission to the EPA. The NOAA will provide technical comments to the EPA for incorporation and transmittal to the DOE. Timing for submittal of comments by the NOAA will be consistent with the time frames specified for primary document review in Section 9.2. The PNRS provided by the NOAA and each set of technical comments will become part of the administrative record.

#### 7.6.2 Department of the Interior

The DOI responsibilities as a natural resource trustee will be shared by three separate bureaus within the DOI. These bureaus are the U.S. Geological Survey, U.S. Fish and Wildlife Service, and the Bureau of Indian Affairs. Each bureau will prepare a report for DOI based on its respective responsibility as a natural resource trustee. The DOI will consolidate these reports and issue a PNRS. The DOI will coordinate with other natural resource trustees, as appropriate, to preclude duplication of effort. The PNRS conducted by DOI will become part of the administrative record.

The PNRS will be completed under an existing interagency agreement between the DOI and the EPA. If further work beyond the PNRS is undertaken by the DOI, such work will be funded through DOI sources.

#### 7.7 HEALTH ASSESSMENTS

The Agency for Toxic Substances and Disease Registry (ATSDR) is a part of the U.S. Public Health Service, which is under the U.S. Department of Health and Human Services. The ATSDR was created by Congress to help implement the health-related sections of laws that protect the public from hazardous waste and environmental spills of hazardous substances. The CERCLA requires ATSDR to conduct a health assessment within one year following proposal to the NPL for any site proposed after October 17, 1986.

The ATSDR health assessment is the result of the evaluation of data and information on the release of hazardous substances into the environment. Its purpose is to assess any current or future impacts on public health, to develop health advisories or other health recommendations, and to identify studies or actions needed to evaluate and mitigate or prevent adverse human health effects.



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The ATSDR will prepare a preliminary health assessment for each of the four Hanford NPL areas (the 100, 200, 300, and 1100 Areas). Since the RI Phase I reports for these areas will not be available within one year following the proposal of Hanford to the NPL, these preliminary health assessments will be based on the best available information.

As additional information becomes available, and as appropriate, ATSDR may, at its discretion, expand these preliminary health assessments into full health assessments adding to the overall characterization of the site, or prepare addenda to the health assessments addressing the public health impact of either individual or a combination of operable units at the site.

The health assessments, including any addenda, will become part of the administrative record.

## 7.8 QUALITY ASSURANCE

The level of quality assurance and quality control (QA/QC) for the collection, preservation, transportation, and analysis of each sample which is required for implementation of this Agreement shall be dependent upon the data quality objectives for the sample. Such data quality objectives shall be specified in RI/FS or RFI/CMS work plans or in other work plans that may be used to describe sampling and analyses at CERCLA or RCRA past-practice units.

The QA/QC requirements shall range from those necessary for non-laboratory field screening activities to those necessary to support a comprehensive laboratory analysis that will be used in final decision-making. This range of QA/QC options is included in the "Data Quality Strategy for Hanford Site Characterization" (as listed in Appendix F). This document is subject to approval by EPA and Ecology.

Based upon the data quality objectives, the DOE shall comply with EPA guidance documents for QA/QC and sampling and analysis activities which are taken to implement the Agreement. Such guidance includes:

- "Guidelines and Specifications for Preparing Quality Assurance Program Plans" (QAMS-004/80);
- "Interim Guidance and Specifications for Preparing Quality Assurance Project Plans" (QAMS-005/80); and
- "Data Quality Objectives for Remedial Response Activities" (EPA/540/G-87/003 and 004).

In regard to quality assurance requirements for construction of land disposal facilities, DOE shall comply with "Technical Guidance Document: Construction Quality Assurance for Land Disposal Facilities" (EPA/530-SW-86-031).

For analytical chemistry and radiological laboratories, the QA/QC plans must include the elements listed in "Guidance on Preparation of Laboratory Quality Assurance Plans" (as listed in Appendix F). DOE shall submit laboratory QA/QC plans to EPA and Ecology for review as secondary documents prior to use of that laboratory. In the event that DOE fails to demonstrate to the lead regulatory agency that data generated pursuant to this agreement

was obtained in accordance with the QA/QC requirements of this section, including laboratory QA/QC plans, DOE shall repeat sampling or analysis as required by the lead regulatory agency. Such action by the lead regulatory agency shall not preclude any other action which may be taken pursuant to this Agreement. For other data, Ecology or EPA may request DOE to provide QA/QC documentation. Any such data that does not meet the QA/QC standards required by this section shall be clearly flagged and noted to indicate this fact.

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## 8.0 MEETINGS AND REPORTS

### 8.1 PROJECT MANAGERS MEETING

Project managers shall meet at least quarterly to discuss progress, address issues, and review plans for the next quarter. The DOE will mark up the work schedule (Appendix D) to reflect current status and will present it at the meeting. In addition, at the request of any project manager, selected schedules from work plans, closure plans, etc., will be marked up to reflect current status and presented at the meeting along with any supporting technical information concerning the units. Any agreements and commitments resulting from the meeting will be prepared and signed by all parties as soon as possible after the meeting. The DOE shall issue meeting minutes to all parties within five working days following the meeting. The minutes will include, at a minimum, the following:

- Status of previous agreements and commitments
- Any new agreements and commitments
- Work schedule (with current status noted)
- Any approved changes signed off at the meeting in accordance with Section 12.2.

### 8.2 UNIT MANAGERS MEETING

Unit managers shall meet to discuss progress, address issues, and review near-term plans pertaining to their respective operable units and/or TSD groups/units. For TSD groups and operable units, meetings shall be held monthly, unless the unit managers for three parties agree that a meeting is not appropriate, once work plans, closure plans, or Part B permit applications have been submitted to EPA and Ecology for review. The meetings shall be technical in nature, with emphasis on technical issues and work progress. The assigned DOE unit manager shall mark up the appropriate schedules from the RI/FS work plan, closure plan, etc., and/or detailed near-term schedules prior to the meeting. The schedules shall address all ongoing activities associated with the operable unit or separate TSD groups/units, to include actions on specific units (e.g., sampling). These schedules will be provided to all parties and reviewed at the meeting. Any agreements and commitments (within the unit manager's level of authority) resulting from the meeting will be prepared and signed by all parties as soon as possible after the meeting. Meeting minutes will be issued by the DOE unit manager summarizing the discussion at the meeting, with information copies to the project managers. The minutes will be issued within five working days following the meeting. The minutes will include, at a minimum, the following:

- Status of previous agreements and commitments
- Any new agreements and commitments
- Schedules (with current status noted)
- Any approved changes signed off at the meeting in accordance with Section 12.2.

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## 9.0 DOCUMENTATION AND RECORDS

This section categorizes the documents that are described in this action plan, and describes the processes for their review and comment and for their revision if required. In addition, this section identifies the distribution requirements for documents and the requirement for an administrative record.

### 9.1 CATEGORIZATION OF DOCUMENTS

For purpose of the action plan, all documents will be categorized as either primary or secondary documents. Primary documents are those which represent the final documentation of key data and reflect decisions on how to proceed. Table 9-1 provides a listing of primary documents. Secondary documents are those which represent an interim step in a decision-making process, or are issued for information only and do not reflect key decisions. Table 9-2 provides a listing of secondary documents. Note that only primary documents are subjected to the dispute resolution process in accordance with the Agreement.

### 9.2 DOCUMENT REVIEW AND COMMENT PROCESS

#### 9.2.1 Primary Documents (with exception of Part B Permit Applications and Closure/Postclosure plans)

Figure 9-1 provides the process flow for reviewing and commenting on primary documents. The flowchart reflects the multiple paths that a primary document may take depending on the type and extent of comments received. The time periods for specific actions are as noted on Figure 9-1. The process shown in Figure 9-1 does not preclude either the EPA or Ecology (whichever has authority regarding the primary document) from taking enforcement action at any point in the process for failure to perform. Comments may concern all aspects of the document (including completeness) and should include, but are not limited to, technical evaluation of any aspect of the document, and consistency with RCRA, CERCLA, the NCP, and any applicable regulations, pertinent guidance or written policy. Comments by the lead regulatory agency shall be provided with adequate specificity so that the DOE can make necessary changes to the document. Comments shall refer to any pertinent sources of authority or references upon which the comments are based and, upon request of the DOE, the commenting agency shall provide a copy of the cited authority or reference. The lead regulatory agency may extend the comment period for a specified period by written notice to the DOE prior to the end of the initial comment period.

Representatives of the DOE shall make themselves readily available to the EPA and Ecology during the comment period for the purposes of informally responding to questions and comments. Oral comments made during these discussions are generally not the subject of a written response by the DOE.

Upon receiving written comments from the lead regulatory agency, the DOE will update the document and/or respond to the comments (for closure plans, comments will be provided in the form of an NOD). The response will address all written comments and will include a schedule for obtaining additional information if required. The DOE may request an extension for a specified period for responding to the comments by providing a written request to the lead regulatory agency.

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Table 9-1. Primary Documents.

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Remedial investigation/feasibility study (RI/FS) work plan  
Remedial investigation (RI) Phase II report  
Feasibility study (FS) Phases I and II report  
FS Phase III report  
Proposed plan  
Remedial design (RD) report  
Remedial action (RA) work plan  
Operation and maintenance (O&M) plan  
Closure plan  
Part B Permit Application (for operation and/or postclosure)  
RCRA facility assessment (RFA) report  
RCRA facility investigation/corrective measures study (RFI/CMS)  
work plan  
RCRA facility investigation (RFI) report (Final)  
Corrective measures study (CMS) report (Preliminary and final)  
Corrective measures implementation (CMI) work plan  
Corrective measures design (CMD) report  
Interim response action (IRA) proposal  
Interim measure (IM) proposal  
Other work plans (As specified in Section 11.5)  
Other documents as specified elsewhere in the Agreement

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Table 9-2. Secondary Documents.

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Hanford Operable Units Report (Currently titled "Preliminary Operable Units Designation Project")

RI Phase I report

RFI Report (Preliminary)

Hanford Site waste management units report

Sampling and data results

Treatability Investigation Work Plan\*

Treatability Investigation Evaluation Report

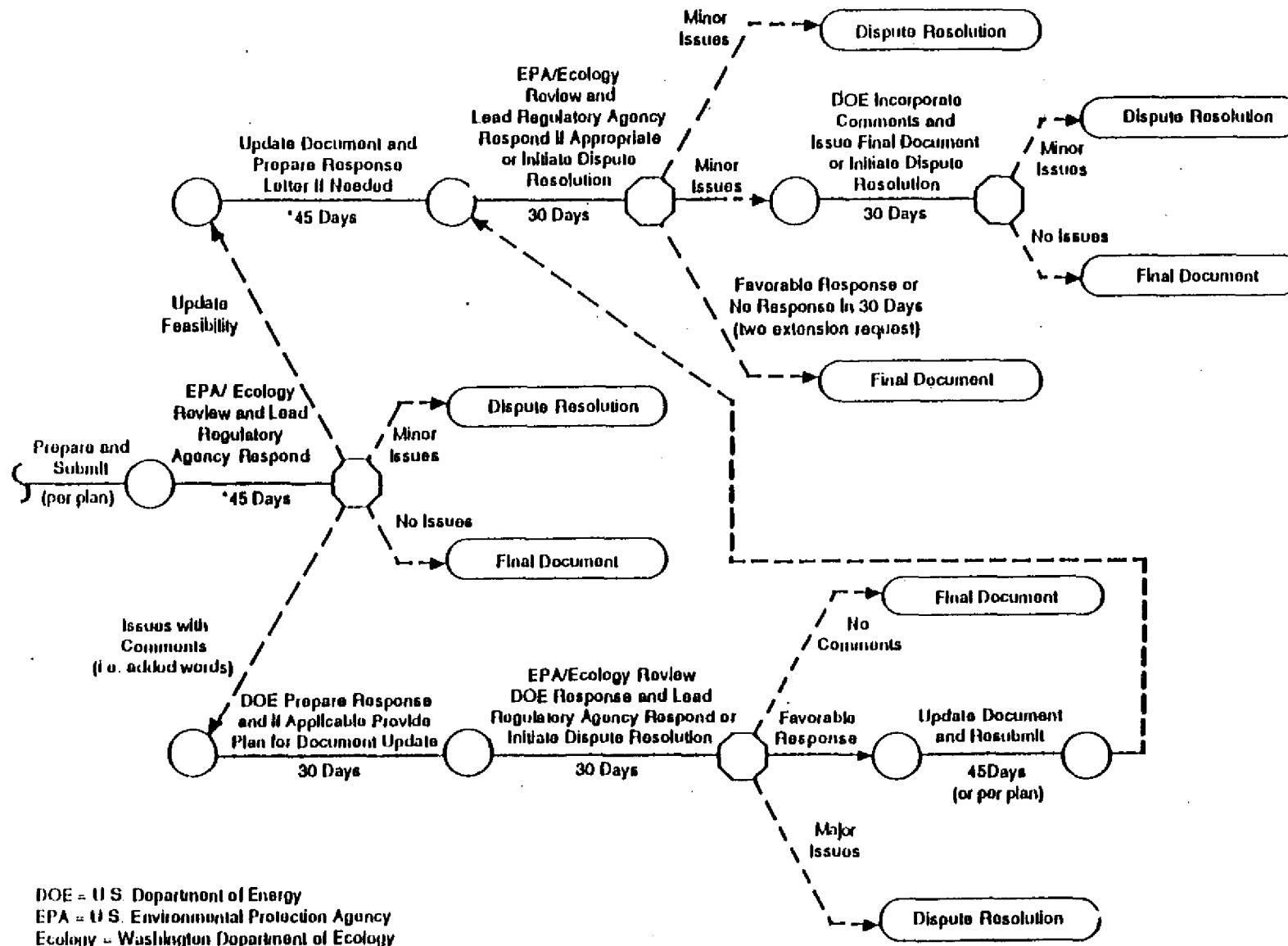
Supporting studies and analyses

Other related documents, plans, and reports not considered as primary

\*Per Section 7.3.6, selected treatability investigation work plans can be established as primary document by the lead regulatory agency (or EPA and Ecology for those performed outside of a specific operable unit).

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\*With exception of 60 days for RI/FS work plans and RFI/CMS work plans

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Figure 9-1. Review and Comment on Primary Documents. (See Figure 9-2 for Part B Permit Application and Closure/Pre-Closure Plan Review)



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Upon receiving responses to the comments on a primary document, the lead regulatory agency will evaluate the responses. In the event that the responses are inadequate, the matter will enter the dispute resolution process as set forth in the Agreement. However, dispute resolution related to NODs cannot be initiated until after two NODs have been issued by the lead regulatory agency, unless otherwise agreed to by all parties. It is anticipated that the majority of the disputes will be resolved during the informal dispute resolution period. Within 21 days of completion of the dispute resolution, or within 30 days of receipt of the lead regulatory agency evaluation of the responses if there is no dispute, the DOE will incorporate the resolved comments into the document. The DOE may extend the period for revising the document by obtaining written approval of the lead regulatory agency.

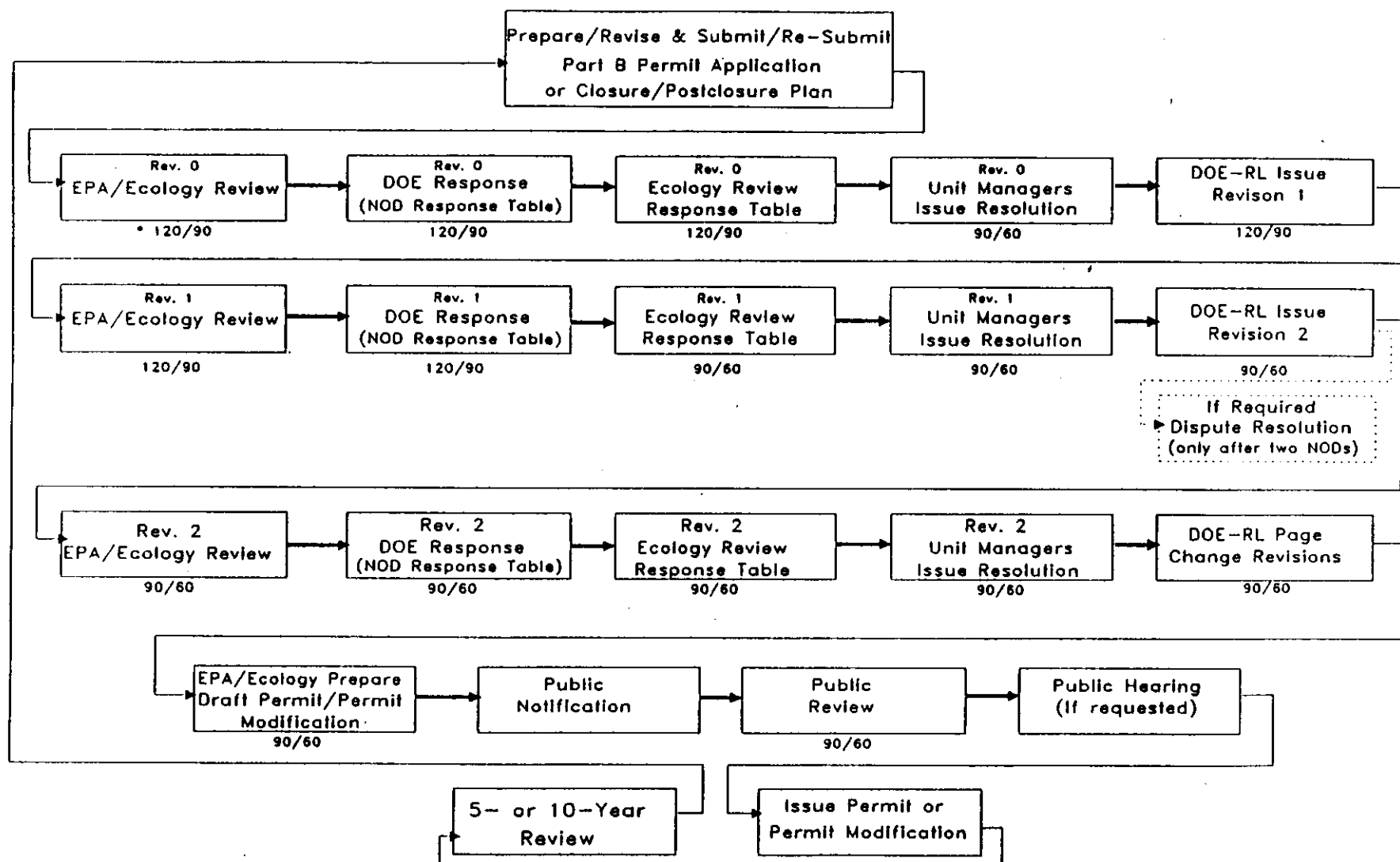
Upon receiving an updated document, the lead regulatory agency will determine if the document is complete. If major issues still exist, the dispute resolution process can be initiated. If the document is complete, or only minor modifications are necessary, the lead regulatory agency will so notify the DOE. If the lead regulatory agency does not respond and has not notified DOE of the need for an extension, the document becomes final at the end of the 30-day period.

#### **9.2.2 Part B Permit Applications and Closure/Postclosure Plans (Operations and Postclosure)**

The process for review of Part B Permit Applications and Closure/Postclosure Plans will be different than for other primary documents due to the size and complex nature of these documents. In addition, Part B Permit Applications do not receive final "approval" from the regulatory agencies. These documents, when complete, are used to form permit conditions. Portions of the applications will be incorporated into the permit along with permit conditions.

Figure 9-2 shows the process for review of Part B Permit Applications and Closure/Postclosure Plans. Upon receiving these documents from the DOE, the lead regulatory agency will provide comments as outlined in Figure 9-2. It is understood by the parties that in many cases the lead regulatory agency will extend the comment period for a specified period of time to accommodate the complexity and size of the document.

If the Part B Permit Application or Closure/Postclosure Plan is determined to be incomplete, comments will be transmitted by the lead regulatory agency in the form of an NOD. Upon receiving an NOD, the DOE will update the document as necessary by following the review/response process outlined in Figure 9-2. With concurrence of the lead regulatory agency, the update may be in the form of either supplemental information to, or a revised portion of, the previously submitted Part B Permit Application or Closure/Postclosure Plan. If the DOE is unable to comply with this timeline, it may request an extension within 30 days of receipt of the NOD. This request will include specific justification for granting an extension, a detailed description of actions to be taken, and the proposed date for resubmittal of the application.



• Permit or Closure/Postclosure  
Days for Completion

DOE = U.S. Department of Energy  
Ecology = State of Washington Department of Ecology  
EPA = U.S. Environmental Protection Agency  
NOD = Notice of Deficiency

Figure 9-2. Part B Permit Application and Closure/Postclosure Plan Process Flowchart.

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Dispute resolution for NODs cannot be initiated until two NODs have been issued by the lead regulatory agency, unless agreed to by all parties. Once an application or closure plan is determined by the lead regulatory agency to be complete, the agency will begin drafting the permitting document. The permitting actions are also shown in Figure 9-2. The process for development and maintenance of the Hanford Site permit is discussed in Section 6.2

In addition to standard public notification procedures, the public will be informed about proposed permit and closure actions in the "Hanford Newsletter" and at quarterly public meetings. However, it is anticipated that in many cases, comments from the public will result in a public hearing on the draft document. All comments on the draft document, including those received during the public hearing will be addressed in a response summary and incorporated in accordance with 173-303-840(7) and (9) WAC. Public hearing opportunities are further discussed in Section 10.7.

### 9.2.3 Secondary Documents

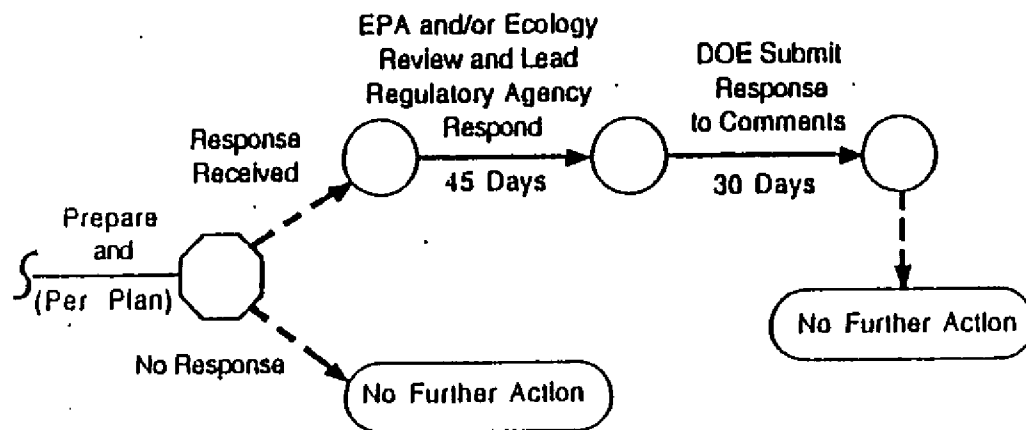
Figure 9-3 provides the process flow for reviewing and commenting on secondary documents. As shown, the EPA and Ecology have the option to provide comments or take no action. If comments are provided by the lead regulatory agency, then the DOE will respond in writing. The same criteria for review presented in Section 9.2.1 for primary documents will be used for secondary documents. Secondary documents are not subject to dispute resolution.

## 9.3 DOCUMENT REVISIONS

Following finalization of a document, the EPA, Ecology, or the DOE may seek to modify the document. Such modifications may require additional field work, pilot studies, computer modeling, or other supporting technical work. This normally results from a determination, based on new information (i.e., information that became available or conditions that became known after the report was finalized), that the requested modification is necessary. The requesting party may seek such a modification by submitting a concise written request to the appropriate project manager(s).

In the event that a consensus on the need for a modification is not reached by the project managers, any party may invoke dispute resolution, in accordance with the Agreement, to determine if such modification shall be conducted. Modification of a report shall be required only upon a showing that the requested modification could be of significant assistance in evaluating impacts on the public health or the environment, in evaluating the selection of remedial alternatives, or in protecting human health and the environment.

Nothing in this section shall alter the lead regulatory agency's ability to request the performance of additional work in accordance with the Agreement. If the additional work results in a modification to a final document, the review and comment process will be the same as for the original document. Minor changes to approved plans which do not qualify as minor field changes under Section 12.4 can be made through use of a change notice. Such plans include RI/FS work plans, remedial action work plans, RFI/CMS work plans, CMI work plans, and other work plans as described in Section 11.5. (Modifications to permits and closure plans will be done in accordance with



DOE = U.S. Department of Energy

Ecology = State of Washington Department of Ecology

EPA = U.S. Environmental Protection Agency

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Figure 9-3. Review and Comment on Secondary Documents.

applicable procedures specified in 173-303 WAC and 40 CFR 270.41.) The change notice will not be used to modify schedules contained within these supporting plans. Such schedule changes will be made in accordance with Section 12.0, Changes to Action Plan/Supporting Schedules.

Minor changes to approved plans include specific additions, deletions, or modifications to its scope and/or requirements which do not affect the overall intent of the plan or its schedule. The lead regulatory agency will evaluate the need to revise the plan. If the revision is determined to be necessary, the lead regulatory agency will decide whether it can be accomplished through use of the change notice, or if a full revision to the plan in accordance with this section is required.

The change notice will be prepared by the appropriate DOE unit manager and approved by the assigned unit manager from the lead regulatory agency. The approved change notice will be distributed as part of the next issuance of the applicable unit managers' meeting minutes. The change notice will thereby become part of the Administrative Record. The change notice form shall, as a minimum, include the following:

- Number and title of document affected
- Date document last issued
- Date of this change notice
- Change notice number
- Description of change
- Justification and impact of change (to include affect on completed or ongoing activities)
- Signature blocks for the DOE and lead regulatory agency unit managers

#### 9.4 ADMINISTRATIVE RECORD

The administrative record serves basically the same purpose in the CERCLA, RCRA, and State dangerous waste programs. The administrative record is the body of documents and information that is considered or relied upon in order to arrive at a final decision for remedial action or hazardous waste management.

The requirements governing the administrative record for a CERCLA response action are found in Section 113(k) of the CERCLA. Executive Order 12580 and CERCLA guidance documents provide that the administrative record is to be maintained by the regulated Federal facility (i.e., the DOE). The RCRA requirements pertaining to the record are found in 40 CFR 124.9 and 124.18. The State dangerous waste program requirements for the record are found in 173-303-840 WAC.

An administrative record will be established for each operable unit and TSD group and will contain all of the documents containing information considered in arriving at a record of decision or permit. When the

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investigation process begins at each operable unit or when a permit action for a TSD unit (or group of units) is initiated, the administrative record file will be available to the public for review during normal business hours at the following location:

- Westinghouse Hanford Company  
Environmental Data Management Center  
2440 Stevens Center  
Room 1101  
Mail Stop: H6-08  
Richland, Washington 99352

Two additional copies of the file will also be available to the public, during normal business hours, located as follows:

- EPA Region 10  
Superfund Administrative Record Center  
1200 Sixth Avenue  
Park Place Building  
Mail Stop: HW-113  
Seattle, Washington 98101
- Washington State Department of Ecology  
300 Desmond Drive  
P.O. Box 47600  
Lacey, Washington 98503

The DOE will compile and maintain the administrative record file at Richland, Washington, and provide copies to the EPA and Ecology for their respective files. At the time when the decisional document is signed, all documents forming the basis for selection of the final action(s) must have been placed in the administrative record file. Microfilm copies will be regularly provided to the EPA and Ecology for use in their files. This will include microfilm for all documents included since the last set of microfilm was provided. Microfilm readers will be made available for use at these locations.

A microfilm copy and one hard copy of the administrative records will be maintained in the Richland administrative record file. After one year following the CERCLA record of decision or RCRA permit determination, the hard copies of administrative record documents issued up to those decision points may be removed from the administrative record file. The microfilm copies will be kept on file for a minimum of 10 years. The final decision documentation (i.e., CERCLA proposed plan and record of decision, and RCRA permit) will be maintained in hard copy through completion of all remedial actions or the term of the permit. Current versions of all general documents (e.g., guidance and applicable procedures) will be maintained in hard copy throughout the RI/FS process or through the term of the permit.

Certain types of documents will be included in the administrative record in all cases when considered applicable to one or more operable units or TSD groupings. These documents are shown in Table 9-3.

Table 9-3. Administrative Record Documents. (sheet 1 of 2)

Factual Information/Data (CERCLA)

Remedial investigation/feasibility study work plan  
Remedial investigation Phase I report  
Feasibility study Phase I and II report  
Feasibility study Phase III report  
Proposed plan  
Abatement proposal  
Interim response action proposal  
Documentation of preliminary assessment/site investigation  
Treatability study work plan and characterization plan  
ATSDR health assessment  
Preliminary natural resource survey (by natural resource trustee)  
Procedures as specified in work plans  
Supplemental work plan  
Health assessment  
Work plan change notice  
Sample data results

Factual Information/Data (RCRA)

Closure Plan  
Permit application (Part A and Part B)  
Draft permit (or permit modification) or notice of intent to deny  
Statement of basis or fact sheet, including all resources to documentation  
RCRA facility assessment report  
RCRA facility investigation/corrective measures study work plan  
RCRA facility investigation report (preliminary and final)  
Corrective measures study report (preliminary and final)  
Interim measure proposals  
Procedures as specified in work plans  
Work plan change notice  
Sample data results

Policy and Guidance

Memoranda on policy decision  
Guidance documents  
Supporting technical literature

Decision Documents

Record of Decision  
Responsiveness summary  
Letters of approval  
Action memoranda  
Waiver requests and regulatory agency responses

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Table 9-3. Administrative Record Documents. (sheet 2 of 2)

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Enforcement Documents

Federal Facility Agreement and Consent Order including Action Plan  
Administrative orders  
Consent decrees  
Affidavits

Public Participation

Community relations plan  
Correspondence to or from the public  
Public notices  
Public comments  
Public meeting minutes  
Public hearing transcripts  
Responses to public comments  
Fact sheets (public information bulletins)

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For those which are designated as primary documents (see Table 9-1) the administrative record will include:

- All drafts submitted to the regulatory agencies for review and/or approval
- Written comments from the support regulatory agency to the lead regulatory agency
- Written comments from the lead regulatory agency to DOE (to include Notice of Deficiency on a Permit Application)
- DOE written responses to comments received from the lead regulatory agency
- Final document and any subsequent revisions
- Drafts which are submitted for public comment.
- For public comment documents, the public comments and lead regulatory agency responses (if no comments are received, a letter from the lead regulatory agency shall be included documenting that fact).

For those which are designated as secondary documents (see Table 9-2), the administrative record will include:

- Final document and any subsequent revisions
- Written comments from the support regulatory agency to the lead regulatory agency, if provided
- Written comments from the lead regulatory agency to DOE, if provided
- DOE written responses to comments received from the lead regulatory agency.

Drafts of documents which are undergoing internal review within any party will not be included in the administrative record.

In addition to those documents listed in Table 9-3, the unit managers for each party will determine which additional documents should be included in the administrative record. This may include:

- Validated sampling and analysis results
- Supporting technical studies and analyses
- Inspection reports and follow up responses.

The unit managers will meet at least monthly, as described in Section 8.2. During these meetings, the unit managers will decide which documents are appropriate for inclusion in the record. The DOE unit manager will then notify the administrative record staff of these documents to be added to the record.

For public participation documents listed on Table 9-3 the community relations staff for any party may transmit any document which they generate or receive directly to the administrative record staff, with a copy to each affected unit manager.

Any documents that the regulatory agency has determined to be subject to an applicable privilege, and that are part of the administrative record, shall be maintained exclusively in files of the appropriate parties until such time as enforcement action has been taken or the privilege has been waived.

The DOE will maintain an index of all documents entered into the administrative record. A current copy of the index will be distributed at least quarterly to each administrative record file, each public information repository, and each project manager.

## 9.5 DISTRIBUTION OF DOCUMENTS AND CORRESPONDENCE

- Unit managers' correspondence, not affecting decisions on remedial actions, is sent to the following:
  - Unit managers for the operable unit at all three parties
  - Project managers at all three parties
- Unit managers' correspondence, affecting decisions on remedial actions, is sent to the following:
  - Unit managers for the operable unit at all three parties
  - Project managers at all three parties
  - Administrative record files
- Project managers' correspondence, not affecting decisions on remedial actions, is sent to the following:
  - Project managers at the other two parties
  - Affected unit managers
- Project managers correspondence, affecting decisions on remedial actions, is sent to the following:
  - Project managers at the other two parties
  - Administrative record files
  - Affected unit managers
- Final primary or secondary documents and draft primary documents are sent to the following:
  - Unit managers for the operable unit at all three parties
  - Project managers at all three parties
  - Administrative record files

Note: Documents distributed to the public information repositories are specified in the Community Relations Plan.

## 9.6 DATA ACCESS AND DELIVERY REQUIREMENTS

### 9.6.1 Data Reporting Requirements

The unit managers will provide a list of the nonlaboratory data collected at each operable unit on behalf of their respective parties at the monthly unit managers meetings. This will allow each party to determine its data needs and to establish the format, quality, and timing for submitting the data.

### 9.6.2 TPA Data

Ecology and EPA shall be granted access to all data that is relevant to work performed, or to be performed, under the TPA. Access to TPA related databases will be documented in the TPA Appendix F document "TPA Databases, Access Mechanisms, and Procedures" (includes all databases and the method of accessing each database). This document will also describe method(s) for regulatory access to DOE communications networks and system configurations to meet electronic transfer of data.

### 9.6.3 Validation

Data validation shall be performed in accordance with approved sampling and analysis plans and quality assurance project plans (QUAPjPs). Laboratory analytical data validation procedure shall incorporate *Data Validation Guidelines for Contract Laboratory Program Organic Analyses* and *Data Validation Guidelines for Contract Laboratory Program Inorganic Analyses*. The DOE shall make available to EPA and Ecology validated and unvalidated laboratory analytical data. Any document produced by any of the three parties which contains unvalidated or otherwise caveated data shall be marked as such.

Ecology and EPA shall be notified of the availability of laboratory analytical data via electronic mail, facsimile transmission, or other means as agreed by the parties involved. Notification shall occur within one week of data entry and shall include the following information:

- date(s) of collection
- unit(s) where data collected
- type of data, e.g., ground water
- location of where data is stored, e.g., database
- unique identifier given to each piece of data, e.g., sample ID.

### 9.6.4 Non-Electronic Data Reporting

For data not available in electronic format, DOE shall meet the data reporting requirements by providing a summary list of new data at the unit managers meetings, or as otherwise requested by EPA or Ecology. This list will include, at a minimum, the information described in the preceding paragraph addressing notification. The lead regulatory agency shall determine on a case-by-case basis if data warrants a more detailed presentation or analysis. This reporting method shall also be used for field screening data. Field screening data shall be accompanied by maps or sketches with sufficient detail to determine where the data was obtained.

The information shall be submitted to the requesting party within ten days of receipt of EPA's or Ecology's written request, or as otherwise agreed to by the parties involved. In addition, other reporting requirements may be specifically required by the RCRA permit, RCRA closure plans or work plans.

#### 9.6.5 Electronic Data Access Requirements

EPA and Ecology shall have direct read, retrieve, and transfer access to all relevant electronic data and databases. All validated data will be entered into the selected database in accordance with the Data Delivery Schedules in Section 9.6.6. Unvalidated data will be available within 7 days after receipt from the laboratories. Electronic access to Hanford data will be provided to EPA, Ecology and their respective contractor staff when:

- The computer network infrastructure is available to support user access (for systems that cannot support direct access data shall be provided through redundant systems or through copies of data stored in other systems), and
- The database system is accessible and utilized by Hanford personnel doing TPA related work.

#### 9.6.6 Data Delivery Schedules

The level of quality assurance for each characterization sample shall meet the requirements of Tri-Party Agreement Article XXXI (Quality Assurance) and shall depend on the specified Data Quality Objectives (DQO) as stated in the specific sampling and analysis plans and quality assurance project plans (QAPjPs). Laboratory analysis and quality assurance documentation, including validation, and transmittal to the regulators, shall be limited to the following schedule:

- Transuranic and hot cell samples - 136 days annual average, but not to exceed 176 days
- Single-shell tank samples - 216 days
- Low-level and mixed waste (up to 10 mr/hour) samples - 111 days annual average, but not to exceed 126 days
- Nonradioactive waste samples - 86 days.

All schedules in this section are effective beginning with the date of individual sampling activities. For unique circumstances, a schedule other than that specified in this section can be agreed to by DOE and the lead regulatory agency. The DOE will integrate all of the data discussed in this section into the appropriate databases and reports.

#### 9.6.7 Other Data Reporting Requirements

The TPA Strategic Data Management Plan (reference M-35-02) will identify what types of information the DOE will index and a schedule to accomplish the indexing. The indexes will be available to all parties. Depending on the

information, the regulators may request the information either electronically and/or by hardcopy. The hardcopy information shall be provided by DOE within 10 days after receipt of written request.

#### 9.6.8 EPA and Ecology Data

Analytical data that is developed by EPA and/or Ecology and is of value to the three parties will be made available in the appropriate media to the three parties. The regulator(s) developing the analytical data shall provide the data in a format suitable for data storage and retrieval. Other data or information requests will be reviewed and handled on a 'case-by-case' basis directly by the parties involved.

#### 9.6.9 Data Management Agreements

The Data Management Unit Manager meeting will provide the forum for addressing data management needs and issues. Meetings will be held with EPA and Ecology at a frequency agreed to by the parties.

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## 10.0 COMMUNITY RELATIONS/PUBLIC INVOLVEMENT

### 10.1 INTRODUCTION

This section describes, in general, the way in which the public will be involved with the implementation of this action plan. The CERCLA, as amended, requires that a community relations plan (CRP) be approved by the EPA prior to initiation of field work related to an RI/FS. The parties have agreed that the CRP is also the proper mechanism to address the public involvement process for all of the RCRA activity to be conducted pursuant to this action plan. In this way, a single document will specify how the public will be involved in these processes.

A CRP has been drafted which will become the overall plan for community relations and public involvement. The following sections highlight key elements of the CRP.

### 10.2 PUBLIC INFORMATION REPOSITORIES

Information will be readily available to the public to ensure meaningful participation. One mechanism for accomplishing this goal is the establishment of public information repositories at major population centers. The locations of the repositories are as follows:

- University of Washington - Suzzalo Library  
Mailstop FM-25 - Government Publications  
Seattle, Washington 98915  
(206) 543-4664
- DOE-RL Public Reading Room  
Washington State University/Tri-Cities  
100 Sprout Road  
Room 130  
Richland, Washington 99352  
(509) 376-8583
- Portland State University  
Branford Price Millar Library  
SW Harrison and Park  
P.O. Box 1151  
Portland, Oregon 97207  
(503) 725-3690
- Gonzaga University  
Foley Center  
E. 502 Boone  
Spokane, Washington 99258  
(509) 328-4220, extension 3125

All documents (with exception of drafts) listed on Table 2 of the CRP will be sent to the repositories. In addition, copies of drafts when submitted for public comment will be placed in the repositories. Any additional information or documents will be placed in the repositories as deemed necessary by the project managers. In addition to review of documents

at the repositories, the public may also review the administrative record files during normal working hours (see Section 9.4 for discussion and location of administrative records).

### **10.3 MAILING LISTS AND NEWSLETTER**

A single Hanford Site mailing list will be maintained by the DOE for use by all three agencies to ensure consistency. The EPA, Ecology, or the DOE will periodically distribute information in the form of a direct mailing to those persons on the Hanford Site mailing list. Any person may be placed on the Hanford Site mailing list by contacting any of the community relations contacts shown in Appendix E.

A direct mailing will usually be in the form of a public information newsletter. The newsletter is a summary of the status of completed, ongoing, or upcoming activities. In some instances, this newsletter may be used in conjunction with a public notice and/or advertisement (newspaper or radio) to announce an event such as a public meeting, a public hearing, or a formal comment period on a certain document.

### **10.4 PRESS RELEASES**

Any party issuing a formal press release to the media regarding any of the work required by this Agreement shall, whenever practicable, advise the other parties of such press release and the contents thereof, at least 48 hours before the issuance of such a press release.

### **10.5 PUBLIC MEETINGS**

#### **10.5.1 Quarterly Public Information Meetings**

The EPA and Ecology, with the assistance of the DOE when requested, will conduct public information meetings at least quarterly. The quarterly meetings will cover significant issues pertaining to CPP units, RPP units, Federal RCRA/State dangerous waste permitting activities, and closure activities that took place during the previous three months. The quarterly meetings will also provide a forum for discussing with the public anticipated events scheduled during the next quarter.

#### **10.5.2 Other Public Meetings**

Additional public meetings on either CERCLA or RCRA matters will be scheduled on an as-needed basis, as determined by the EPA or Ecology. Situations involving complex issues or a high level of public interest will be reasons to schedule separate public meetings.

At least one public meeting will be held during the public comment period for each FS Phase III report/proposed plan. At least one public meeting for each CMS report will be held in conjunction with a public meeting for the relevant draft permit (or permit modification) package. Such meetings will be scheduled approximately halfway through the public comment period. All public comments received on these documents, along with the lead regulatory agency's response to comments, will be placed in the administrative record and will be sent to the public information repositories.



### 10.5.3 Public Notification, Location, and Records

The DOE, at the request of the EPA and/or Ecology, will arrange for all public meetings by means of a public notice in a newspaper of general circulation and a major radio station in the area where the meeting is to be held. The DOE will also distribute a direct mail notice to all persons on the Hanford Site mailing list. All such notices shall be made 2 to 3 weeks prior to the date of the public meeting. The quarterly public information meetings will be scheduled, to the extent practicable, to coincide with public comment periods or other significant events.

The location of any public meeting will be decided in each case by the EPA and Ecology. In some cases, the agencies may decide to hold an additional public meeting on a subsequent day at another location.

Upon request by the EPA or Ecology, the DOE will provide an individual to accurately record the events and dialogue at each public meeting. This individual will provide a written meeting summary of the public meeting for review to the EPA, Ecology, the DOE project managers, and the community relations contacts within 14 days following the meeting. The meeting summaries will then be distributed to each of the public information repositories. Any individual may obtain a copy of the meeting summaries by submitting a request, in writing, to any of the community relations contacts listed in Appendix E.

### 10.6 PUBLIC COMMENT OPPORTUNITIES

The EPA and/or Ecology will make the documents as listed in this section available for public comment. These documents will be placed in the public information repositories. They may also be reviewed at the EPA Region 10 office in Richland, Washington; the Ecology office in Lacey, Washington; or the DOE office in Richland, Washington, by contacting the respective project managers listed in Appendix E.

Copies of all public comments received and the agencies' responses to comments will become part of the administrative record and will be sent to the public information repositories. Additionally, copies of all public comments and agency responses will be made available to any person upon written request to any of the community relations contacts listed in Appendix E.

The public notice for availability of these documents for comment will be published in a major newspaper of general circulation and announced on a major radio station in the areas of significant public interest and through the direct mailing list (see Section 10.3).

The documents to be made available for public comment are as follows.

- Significant Changes to the Agreement. One of the more significant opportunities for public comments pertains to changes made to the Agreement or its Action Plan. Changes to the Agreement or its Action Plan which are significant, as defined by the Community Relations Plan, shall be made available for public comment for a period of 45 days.

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- RI/FS Work Plan (CERCLA) or RFI/CMS Work Plan (RCRA). Either an RI/FS work plan or an RFI/CMS work plan will be prepared for each operable unit. Prior to lead regulatory agency approval of these work plans, they will be made available for public comment for a period of 30 days. On a case-by-case basis, the unit managers may agree to extend the comment period to 45 days. There is no statutory or regulatory requirement for such public comment, but the parties believe that the earliest possible public involvement will result in improved communication throughout the investigation process. The public notice published in the newspaper announcing the availability of work plans shall also indicate the location and availability of the Administrative Record file.
- Feasibility Study Phase III Report/Proposed Plan or Corrective Measure Study Report. Either an FS Phase III report/proposed plan (CERCLA) or a CMS report (RCRA) will be prepared for each operable unit. When the FS Phase III report and the proposed plan for remedy are finalized, the lead regulatory agency will issue a public notice of opportunity to comment on the documents. If the operable unit is being managed under the RPP authority, rather than CERCLA, the RCRA CMS report will be made available for comment as part of the draft permit modification package. The comment period will be 45 days. There are currently no specific requirements for public comment on the CMS report, but the parties consider this report to be the functional equivalent of the FS Phase III report and the proposed plan and, therefore, will make the CMS report available for public comment in the same manner.
- Draft Joint Dangerous Waste/Resource Conservation and Recovery Act Permits (for Treatment, Storage, and Disposal Units). The permit and associated modifications (see Section 6.2) for either new or continued operation of TSD groups/units or for postclosure care of TSD units will be made available for public comment in accordance with 173-303-840 WAC and 40 CFR 124.10. The comment period will be 45 days.
- Closure Plans (for Interim Status Treatment, Storage, and Disposal Units). All closure plans for TSD units (see Section 6.3) that will be closed prior to or instead of issuance of a permit will be made available for public comment, in accordance with 173-303-840 WAC. The comment period will be 45 days.
- Interim Response Actions and Interim Measures. In any case where the lead regulatory agency believes that a release from a unit meets the criteria for an IRA or IM, as described in Section 7.2.4, it shall direct the DOE to submit either an IRA proposal or an IM proposal for remedy selection. Prior to approval, the lead regulatory agency will make the proposed remedy selection available for public comment for a period of 15 or 30 days.

- RCRA Section 3008(h) Orders and RCRA 7003 Orders. The EPA will propose the selected corrective action remedy to be performed under either RCRA 3008(h) or RCRA 7003 and make it available for public comment prior to final approval. The comment period for 3008(h) orders will be 30 days and the comment period for 7003 orders will be 15 days.
- Community Relations Plan. Any major revisions to the CRP will be subject to public comment for a period of 30 days. The EPA and Ecology will determine whether revisions are major and subject to public comment.

## 10.7 PUBLIC HEARING OPPORTUNITIES

The draft permit and all modifications are subject to public hearings upon request. A public hearing must be held if any person requests, in writing, that one be held. The request must state the nature of the issues to be raised at the hearing and must include a notice of opposition to the draft permit, in accordance with 173-303-840 WAC and 40 CFR 124.11 and 124.12.

The DOE will, upon request, assist the EPA and Ecology in the same manner as with public meetings, as previously described. The public notice for any public hearing will be made by the DOE at least 30 days prior to the date of the hearing. Transcripts of the public hearing will be distributed in the same manner as those for the public meetings. Any individual may obtain a copy of the transcript by submitting a request, in writing, to any of the community relations contacts listed in Appendix E.

A public hearing will be held in the locality from which the majority of requests for the hearing was generated. In some cases, a public hearing may be held at more than one location, at the discretion of the EPA and Ecology.

## 10.8 TECHNICAL ASSISTANCE GRANTS

The provision for Federal technical assistance grants (TAG) is found in Section 117(e) of CERCLA. The EPA will be responsible for administering any Federal TAG that is applied for in conjunction with the Hanford Site. The TAG is a mechanism by which the EPA provides reimbursement to the public for a level of effort spent on CERCLA document review. In this way, the public can be directly involved in the review process of various CERCLA documents in more depth than otherwise might be possible. Information on TAGs can be obtained by contacting:

Technical Assistance Grant Coordinator  
U.S. Environmental Protection Agency  
1200 Sixth Avenue, Mail Stop: HW-113  
Seattle, Washington 98101  
(206) 442-0603

## 10.9 WASHINGTON STATE PUBLIC PARTICIPATION GRANTS

The Model Toxics Control Act, Chapter 70.105D RCW, and 173-321 WAC, provide for public participation grants to persons, and not-for-profit public interest organizations. The primary purpose of these grants is facilitating the active participation of persons and organizations in the investigation and

remedying of releases or threatened releases of a hazardous substance. Additional information on this program may be obtained by contacting:

Public Participation Grant Coordinator  
Solid and Hazardous Waste Program  
Washington Department of Ecology  
PV-11  
Olympia, Washington 98504  
(206) 459-3000

## 10.10 INDIAN TRIBES

The parties recognize that several Northwest Indian tribes have treaty-reserved rights to resources outside their reservation boundaries. In some instances, these resources are either located on the Hanford Reservation or could be affected by activities on the Hanford Reservation. Treaty-reserved rights give these tribes a governmental interest in waste management and environmental restoration activities at Hanford.

DOE and EPA also recognize that, as agencies of the federal government, they have a trust responsibility to American Indian Tribes to consult with the tribes and whenever possible, protect tribal resources which may be affected by agency decision-making. Moreover, DOE, EPA, and the State of Washington have adopted policies which recognize tribal sovereignty and commit to a government-to-government relationship with the tribes.

Given these responsibilities and policies, the parties recognize the unique position of the tribes and the distinction between the rights and responsibilities of the tribes and those of the public. Accordingly, the three parties will seek to facilitate tribal participation in TPA decision-making at the government-to-government level. Among actions to be taken in this regard are:

1. To involve these Tribes in the hazardous waste cleanup and management processes at the Hanford Site, the parties will hold special briefings for all interested Tribes periodically on major issues that have arisen and/or may arise. Such briefings will include status reports of the significant projects and will be consistent with the methods used to inform and respond to questions of appointed and elected officials, and other governments, regarding ongoing CERCLA and RCRA activities. These briefings may be in writing or in person and may be conducted by either the EPA, Ecology, or the DOE, as appropriate. Notice will be provided to all Tribes in the Hanford region. These briefings and the procedures for determining which Tribes will be briefed are further described in Section 2.0 of the CRP.
2. The DOE will provide copies of any of the documents that are sent to the public information repositories directly to the Tribes upon request. The procedure for determining which documents will be sent is described in Section 2.0 of the CRP. The public information repositories are further discussed in Section 10.2 and in the CRP. The specific list of documents that will be sent directly to each repository is included in the CRP. As discussed in Section 10.2, this may include copies of drafts submitted for public comment. Any

comments on these documents must be received by the lead regulatory agency within the time period allowed for public comment. The length of each comment period is specified in Section 10.6, and the specific comment period for each document will be noted in the public notice for comment.

#### 10.11 CITIZEN SUIT PROVISIONS

Statutory provision for citizen suits under CERCLA is found in Section 310 of CERCLA, as amended. Statutory provision for citizen suits under RCRA is found in RCRA Section 7002. The application of these provisions can be found at Articles X and XXI of the Agreement.

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## 11.0 WORK SCHEDULE AND OTHER WORK PLANS

### 11.1 INTRODUCTION

This section describes the format and content of the work schedule, and the process for annual updates and other revisions. In addition, this section identifies those primary documents that contain other schedules that directly support the work schedule.

The work schedule is contained in Appendix D. It includes major and interim milestones and additional target dates that support the accomplishment of the major milestones described in Section 2.0. Both major and interim milestones are considered enforceable under the Agreement. Dates specified as target dates in the work schedule are incorporated in the work schedule for the purpose of tracking progress toward meeting milestones, and are not enforceable. Work plans and reports will specify additional target dates and milestones. The milestones will be incorporated into the Agreement via the change process defined in Section 12.0 upon issuance of the approved work plan or report, and incorporated into the work schedule as part of the annual update. The work schedule will indicate planned actions for each operable unit identified in Appendix C or TSD group identified in Appendix B. Such actions include, but are not limited to, the following:

- Permitting activities
- Closures
- Groundwater monitoring
- Achieving interim status requirements
- Ceasing disposal of contaminated liquids to the soil column
- Investigations and characterization
- Remedial and corrective actions
- Technology improvements
- New facilities to enhance operations and eliminate long-term storage
- Land disposal restriction requirements

### 11.2 WORK SCHEDULE FORMAT AND PREPARATION

The work schedule is depicted on a time-scale format, and is seven years in length. The current calendar year is shown on a monthly time scale in sufficient detail to identify all document submittals, major elements of work, and interactions between parties. The second year is shown on a quarterly scale, with the remaining five years on an annual scale. In addition, a listing of the interim milestones depicted on the work schedule is provided. The listing of the interim milestones is grouped by major milestone.

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The work schedule will be the primary vehicle for the project managers to track progress. The unit managers will rely primarily on the supporting schedules (see Section 11.4) for tracking progress. Until such schedules are issued, the work schedule will depict the necessary detail to track progress. The work schedule is initially prepared and approved as part of this action plan.

### 11.3 ANNUAL UPDATES AND OTHER REVISIONS

The work schedule will be updated annually, at a minimum, with the primary purpose to expand the level of detail for the upcoming calendar year and to include an additional year at the end of the work schedule. In addition, any approved schedule changes (see Section 12.0 for formal Change Control System) will be incorporated at this time if not previously incorporated. Each annual update will be performed during the three months prior to the beginning of the upcoming calendar year or as agreed by the three parties.

The work schedule may also be revised for clarity to incorporate previously approved changes made in accordance with Section 12.2. Such revisions do not require approval signatures and are not subject to the public comment process.

Changes made between annual updates will be accomplished in accordance with Section 12.0. Only in extreme circumstances, and with the concurrence of all parties, will the work schedule be updated during the year except for as noted above.

In the event that all parties do not concur on the annual update or other proposed revision to the work schedule, the issue shall be subject to the applicable dispute resolution process in accordance with Parts Two, Three, or Four of the Agreement.

### 11.4 WORK PLANS AND SUPPORTING SCHEDULES

Unless otherwise specified, workplans, including those workplans prepared under the Hanford Past Practice Investigation Strategy, shall be prepared, reviewed and approved as primary documents. At the time work plans are submitted for approval they shall describe in detail the work to be done and include the performance standards to be met. They shall also include an implementation schedule with start and completion dates. The work plan schedule shall identify completion dates for major tasks and deliverables as interim milestones. Milestones shall be set in a manner which fits the requirements of the work to be accomplished, with at least one milestone every twelve months, unless otherwise agreed to by the Unit Managers. A change package shall be submitted with the workplan which identifies the interim milestones.

Schedules may be constructed in a manner that allows tasks or deliverables which require or follow regulatory agency review and approval to be due a fixed number of days after approval, rather than on a fixed date.



Required workplans include:

- RI/FS work plan
- Remedial action work plan
- Closure plan
- RFI/CMS work plan
- CMI plan
- LFI work plan
- ERA work plans/EECA's.

These ERA work plans/EECA's are not to be prepared, reviewed and approved as primary documents, but are subject to approval in accordance with Section 7.2.4 of the Action Plan. Additional detailed schedules, beyond those contained in the above plans, may be needed as agreed to by the relevant unit managers to provide more definitive schedules to track progress. These may be part of other plans or may be stand-alone schedules.

#### 11.5 OTHER WORK PLANS

In addition to the work plans previously described, other work plans may be developed for special situations at the request of the lead regulatory agency. These work plans will be considered primary documents as discussed in Section 9.1, and are subject to all work plan requirements, including those identified above in Section 11.4.

#### 11.6 SUPPORTING TECHNICAL PLANS AND PROCEDURES

In addition to the requirements as specified in this Agreement, supporting technical plans and procedures may be developed by DOE. They will be reviewed for approval by EPA and Ecology as primary documents or reviewed as secondary documents as determined by EPA and Ecology. The DOE may submit such plans or procedures at any time, without request of the regulatory agencies. The EPA or Ecology may also request that specific plans or procedures be developed or modified by DOE, consistent with Article XXX of the Agreement. These technical plans and procedures shall pertain to specific compliance and cleanup activities conducted pursuant to this Agreement and shall provide a detailed description of how certain requirements will be implemented at the Hanford Site. DOE shall comply with the most recent approved versions of these technical plans and procedures and those secondary documents which are in effect.

Appendix F contains a listing of current supporting technical plans and procedures and their respective status. Changes to Appendix F will be accomplished in accordance with Section 12.0. Appendix F will be updated annually in conjunction with the annual update to the Work Schedule.

#### 11.7 TANK WASTE REMEDIATION SYSTEM CRITICAL PATH PROCESS

Tank waste remediation milestones will be established using a critical path process as described in this section. The tank waste remediation program will be established and managed as an integrated system and shall include all activities associated with waste characterization, retrieval/closure, tank stabilization, pretreatment, treatment of high-level and low-level tank waste, acquisition of new tanks, and the multi-purpose storage complex. The parties

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will develop detailed operating procedures and implement the critical path milestone system on a trial basis, in April 1994, with full implementation by September 30, 1994.

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- A. For the purposes of critical path analysis, negotiated dates for completion of single-shell tank waste retrieval, the final closure of single-shell tank farms, and completion of all high-level and low-level tank waste treatment shall be designated as program endpoints and shall be major milestones.
  - B. Activities and associated schedules for this program shall be included in the Site Management System (SMS). All activities, milestones, and target dates necessary for tracking the program will be negotiated for inclusion in this agreement. Activity definition will be based generally on SMS Level 0 schedules, but may in some instances include SMS Level 1. Based on a critical path analysis, any event appearing on the critical path shall be designated as either a major or an interim milestone. Any event not on the critical path shall be designated a target date.
  - C. On a semi-annual basis, the integrated schedule shall be updated by the project managers or their designees and the critical path shall be re-evaluated. Updates shall be based on current Site Management System (SMS) information. Additional events falling on the critical path shall be designated as interim milestones. The integrated management schedule shall identify schedule float for each task. Schedule float shall be defined as the amount of time available before an activity becomes a critical path activity. Any activity found to be no longer on the critical path shall revert to target date status.
  - D. The Department of Energy shall have the ability to reschedule any activity associated with a target date as necessary to efficiently manage the project, provided such movement shall not adversely affect the critical path or the program endpoints. Unit managers shall be advised in advance in writing of any such changes.
  - E. Changes to any activity or schedule which affects the critical path, a major or interim milestone, or program endpoints must be requested in accordance with Section 12 of the Action Plan, entitled Changes to Action Plan/Supporting Schedules, and approved by the Project Managers or signatories.
  - F. Based on the information in the monthly SMS report, the Department of Energy shall take all appropriate actions to correct schedule slips in critical path activities.

## 12.0 CHANGES TO ACTION PLAN/SUPPORTING SCHEDULES

### 12.1 INTRODUCTION

This section provides the process for changing elements of this action plan without having to process a formal revision. The following identifies what can be modified with this process:

- Major milestones (as identified in Appendix D)
- Appendix A--definition of terms and acronyms
- Appendix B--listing of TSD units
- Appendix C--prioritized listing of operable units
- Appendix D--work schedule
- Appendix E--key individuals
- Appendix F--Supporting Technical Plans and Procedures
- Appendix G--Data Management Initiatives
- Supporting schedules.

### 12.2 AUTHORITY TO APPROVE CHANGES

The appropriate authority level for approval of a change is based on the content of the change as follows.

- Class I Change--A Class I change is a change to a major milestone as defined in Section 2.0. A Class I change requires the approval of the signatories or their successors as shown in Section 14.0.
- Class II Change--A Class II change is any change to Appendices A, B, C, D, E, F, or G except as specified for Class I or Class III changes. A Class II change requires the approval of the project managers.
- Class III Change--A Class III change is a change to a target date in the work schedule (Appendix D) or a supporting schedule that does not impact an interim milestone. A Class III change requires the approval of the DOE and lead regulatory agency unit managers. It is not the intent of the parties to revise target dates because work is slightly behind or ahead of schedule. Such schedule deviations will be reflected through the reporting of work schedule status. The use of the change process for revising target dates is for use by the parties to delete, add, or significantly accelerate or defer a target date.

### 12.3 FORMAL CHANGE CONTROL PROCESS

All types of changes as identified under Section 12.1 shall be processed using the change control sheet included as Figure 12-1. The following describes the process in accordance with the circled numbers shown in Figure 12-1.

- ① Obtain and enter a "change number." The DOE shall maintain a log of all changes by number and title, along with a file copy of the change. An individual will be assigned responsibility for maintaining the change file and will be responsible for assigning change numbers. The change number can be obtained any time during the change process, even after the change is approved.
- ② Enter the name of the originator or the requestor.
- ③ Enter the date the change was initiated.
- ④ Place an "x" in the box for the appropriate class of change per the criteria identified under Section 12.2.
- ⑤ Enter a short title for the change, which will be used primarily as a cross-reference on the change log.
- ⑥ Provide a description of the change, along with justification as to why the change should be made. Use an attached sheet of paper if additional space is required.
- ⑦ Explain what is impacted by this change.
- ⑧ List all documents that will have to be revised because of the change.
- ⑨ Obtain approval signatures based on the class of change assigned. Approval via telephone is acceptable, but must be followed up with a signature as soon as possible thereafter.
- ⑩ This space is available for special notes, comments, or other signatures as required.

Backup information should be attached as necessary to support the change. Once approved, the change is considered implemented. Affected documents (e.g., work schedule) need not be updated until their next scheduled update.

### 12.4 MINOR FIELD CHANGES

To ensure efficient and timely completion of tasks, minor field changes can be made by the person in charge of the particular activity in the field. Minor field changes are those that have no adverse effect on the technical adequacy of the job or the work schedule. Such changes will be documented in the daily log books that are maintained in the field. If it is anticipated that a field change will affect the agreed-to work schedule or requires the approval of the lead regulatory agency, the applicable DOE unit manager will then be notified.

Change Number <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; margin: 0 auto; display: flex; align-items: center; justify-content: center;">1</div>	<b>Federal Facility Agreement and Consent Order Change Control Form</b> <small>Do not use blue ink. Type or print using black ink.</small>	Date <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; margin: 0 auto; display: flex; align-items: center; justify-content: center;">3</div>
Originator <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; display: flex; align-items: center; justify-content: center; margin-left: 100px;">2</div> <div style="float: right;">Phone</div>		
Class of Change <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; float: right;">4</div> <div style="display: flex; justify-content: space-around;"> <span><input type="checkbox"/> I - Signatories</span> <span><input type="checkbox"/> II - Project Manager</span> <span><input type="checkbox"/> III - Unit Manager</span> </div>		
Change Title <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; display: flex; align-items: center; justify-content: center; margin-left: 100px;">5</div>		
Description/Justification of Change  <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; margin-left: 100px; margin-top: 20px;">6</div>		
Impact of Change  <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; margin-left: 100px; margin-top: 20px;">7</div>		
Affected Documents  <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; margin-left: 100px; margin-top: 20px;">8</div>		
Approvals <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; display: flex; align-items: center; justify-content: center; margin-left: 100px;">9</div>  <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;">             _____ DOE           </div> <div style="width: 15%;">             _____ Date           </div> <div style="width: 30%;">             ___ Approved ___ Disapproved           </div> <div style="width: 25%;"></div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 30%;">             _____ EPA           </div> <div style="width: 15%;">             _____ Date           </div> <div style="width: 30%;">             ___ Approved ___ Disapproved           </div> <div style="width: 25%;"></div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 30%;">             _____ Ecology           </div> <div style="width: 15%;">             _____ Date           </div> <div style="width: 30%;">             ___ Approved ___ Disapproved           </div> <div style="width: 25%;"></div> </div>		<div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; margin: 0 auto;">10</div>

Figure 12-1. Change Control Sheet.

## 12.5 REVISION OF ACTION PLAN

In addition to the changes described above, the action plan may be revised at any time when agreed to by all parties. This could result from a change in regulations or guidance documents or a change in authority (e.g., HSWA authority being given to the State). If a revision is required, the project managers will revise the action plan and issue it for public review in accordance with Section 10.0. Upon resolution of public comments, the updated action plan will be signed and issued for use.

Appendices B, C, E, and F will be reissued annually in conjunction with the annual update of Appendix D. Appendices may be updated separately from the action plan at any time to incorporate approved changes. If done, the revised version of the applicable appendix will be dated and transmitted to the project managers and the public information repositories. The transmittal will reference what changes have been incorporated. The DOE project manager will be responsible for maintaining the appendices up-to-date as necessary and distributing the revised appendices.

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## 13.0 LIQUID EFFLUENT TREATMENT AND DISPOSAL

### 13.1 LIQUID EFFLUENT DISCHARGE RESTRICTIONS

#### 13.1.1 Introduction

This section addresses requirements for management of restrictions for discharge of liquid effluents to the soil column at Hanford. These managerial requirements are the result, in part, of EPA's and Ecology's reviews of the Liquid Effluent Study (LES) that was submitted by DOE in August 1990. The LES included information on the 33 Phase I and Phase II liquid effluent streams and was conducted outside the scope of this Agreement. However, the parties agreed that information obtained through the LES would be considered new information (see paragraph 136 of the Agreement) and that such new information could form the basis for reevaluation of the liquid discharge milestones in the Agreement. The liquid effluent discharge milestones are covered in M-17-00.

The purpose of this section is to describe the process which will be followed for establishing additional milestones related to the operation, treatment, and disposal of all 33 Phase I and Phase II liquid effluent discharges to the soil column and to explain the general guidelines to be followed in the establishment of additional milestones. The initial requirements and restrictions contained herein address the seven streams identified by EPA as high priority, as well as five streams associated with the PUREX facility. The parties agree that such requirements and restrictions are necessary to provide near-term assurance that all reasonable steps are being taken to minimize environmental degradation. The long-term solutions are to establish stream specific milestones leading to establishment of treatment processes or ceasing discharges altogether and finally, to regulate any remaining discharges to the soil column through provisions of the State of Washington Waste Discharge Permit Program (WAC-173-216 or, if applicable, WAC-173-218).

#### 13.1.2 State Waste Discharge Permits

The parties agree that those waste water streams currently discharged to the soil column or any future waste water streams (excluding discharges that are exempt from permitting under Section 121 of CERCLA) discharged to the soil column, which affect groundwater or which have the potential to affect groundwater, shall be subject to permitting under RCW 90.48.160, WAC 173-216, or if applicable, WAC 173-218. While the administration of these provisions of state law will be conducted outside this Agreement, Ecology intends to maintain consistency with this Agreement in implementing the state water quality program at the Hanford Site. Ecology and DOE agree to negotiate a separate agreement by September 1991 or such later date as the parties agree upon, which will provide a schedule for obtaining permits and all necessary actions leading to obtaining such permits pursuant to these provisions of state law at the Hanford Site. While DOE is agreeing to Ecology's authority to implement a permit program under RCW 90.48.160 and WAC Chapter 173-216 for liquid effluents discharged to the soil column which affect or have the potential to affect groundwater at the Hanford Site, DOE reserves any rights and defenses under state and federal law in any enforcement or permitting activity including the right to appeal such permits to the appropriate

tribunal and to raise any objection whatsoever to such permits except that DOE will not challenge Ecology's authority to administer the WAC Chapter 173-216 permit program at the Hanford Site.

#### 13.1.3 Liquid Effluent Discharge Milestones and Negotiations

The parties will also negotiate additional interim and final milestones to be included in this Agreement addressing, without limitation, waste reduction, interim and final treatment, and/or termination of the 33 Phase I and Phase II streams. These negotiations will be completed by September 1991. Negotiated milestones will be included in the 1992 Annual Update to the Work Schedule (Appendix D).

The parties are agreeing now to the addition of certain interim milestones (M-17-11, M-17-12, and M-17-13) in Milestone M-17-00. These milestone requirements relate to interim of final remedial actions which will be taken at Operable Units affected by those discharges. The specific descriptions of these milestone requirements are set forth in Appendix D of this Agreement, Tables D-4 and D-5.

#### 13.1.4 Sampling and Analysis Plans

DOE will develop a stream specific sampling and analysis plan (SAP) for the Phase I and Phase II streams which continue to discharge to the soil column as specified in Appendix D, Table D-4. These SAPs shall be subject to approval of EPA and Ecology and will include an implementation schedule. The SAPs must provide for representative sampling of wastes discharged to the soil column, accounting for significant variations in volumes and contaminant concentrations due to operational practices. The frequency of sampling will vary, depending on the consistency or trends established for each stream over time. The SAPs will consider all of the parameters known or suspected to be associated with each liquid effluent stream with consideration given to the influence of operational practice, raw water characteristics, and process knowledge in developing contaminant analysis requirements. DOE will sample and analyze each stream in accordance with the approved sampling and analysis plan. The timing for development of each SAP will be specified on the appropriate M-17-00 milestone as set forth in Appendix D, Table D-4.

#### 13.1.5 Assessment of Environmental Impact of Continuing Liquid Discharges

DOE will develop a methodology for assessing the impact of all discharges (including both active and proposed) on groundwater at the disposal sites. This methodology will rely on available data, additional liquid effluent sampling, analytical results supplied under Section 13.1.4, and optimal management practices. DOE shall submit this methodology to EPA and Ecology for approval. Within 30 calendar days after notification of approval of the methodology, DOE shall submit a schedule for the completion of the assessments for each of the 33 Phase I and Phase II effluent streams which will continue beyond June 1992.



#### 13.1.6 Stream Specific Requirements and Restrictions

The parties agree that interim operating restrictions are necessary to provide near-term assurance that all reasonable steps are being taken to minimize environmental degradation while negotiations and follow on actions are pursued. The twelve high-priority streams and the interim operating restrictions to be implemented for each of those streams are identified in Appendix D, Table D-5.

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14.0 SIGNATURE

The undersigned hereby approve this action plan for implementation:

For the United States Environmental Protection Agency:

\_\_\_\_\_  
Gerald Emison  
Acting Regional Administrator, Region 10  
U.S. Environmental Protection Agency

\_\_\_\_\_  
Date

For the United States Department of Energy:

\_\_\_\_\_  
John Wagoner  
Manager, Richland Operations Office  
U.S. Department of Energy

\_\_\_\_\_  
Date

For the Washington State Department of Ecology:

\_\_\_\_\_  
Mary Riveland  
Director  
Department of Ecology

\_\_\_\_\_  
Date

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## APPENDIX A

### DEFINITION OF TERMS AND ACRONYMS

- Acronyms
- Definition of Terms used in the Action Plan
- Definition of other Technical Terms

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## APPENDIX A

### Acronyms (sheet 1 of 2)

ARAR	Applicable, or Relevant and Appropriate Requirement
ATSDR	Agency for Toxic Substances and Disease Registry
CDR	Conceptual Design Report
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CFR	Code of Federal Regulations
CMD	Corrective Measures Design
CMI	Corrective Measures Implementation
CMS	Corrective Measures Study
CPP	CERCLA Past Practice
CRP	Community Relations Plan
DOE	U.S. Department of Energy
DOI	U.S. Department of Interior
DST	Double Shell Tank
DW	Dangerous Waste
EA	Environmental Assessment
Ecology	State of Washington Department of Ecology
EIS	Environmental Impact Statement
EPA	U.S. Environmental Protection Agency
FFTF	Fast Flux Test Facility
FS	Feasibility Study
HSWA	Hazardous and Solid Waste Amendments (of 1984)
HSWMUR	Hanford Site Waste Management Units Report
HWMA	Hazardous Waste Management Act
HWVP	Hanford Waste Vittrification Plant
IM	Interim Measure
IRA	Interim Response Actions
ISV	In-situ Vittrification
LDR	Land Disposal Restrictions
NCP	National Oil and Hazardous Substances Contingency Plan
NEPA	National Environmental Policy Act
NOAA	National Oceanic and Atmospheric Administration
NOD	Notice of Deficiency
NPL	National Priorities List
O&M	Operation and Maintenance
PNRS	Preliminary Natural Resource Survey
PUREX	Plutonium/Uranium Extraction
RA	Remedial Action
RCRA	Resource Conservation and Recovery Act
RCW	Revised Code of Washington
RD	Remedial Design
RFA	RCRA Facility Assessment
RFI	RCRA Facility Investigation
RFI/CMS	RCRA Facility Investigation/Corrective Measures Study
RI	Remedial Investigation
RI/FS	Remedial Investigation/Feasibility Study
ROD	Record of Decision
RPP	RCRA Past Practice

## APPENDIX A

### Acronyms (sheet 2 of 2)

SST	Single-Shell Tank
TAG	Technical Assistance Grant
TSD	Treatment, Storage, and Disposal
WAC	Washington Administrative Code
WIDS	Waste Identification Data System
WPPSS	Washington Public Power Supply System
WRAP	Waste Receiving and Processing

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## APPENDIX A

### Definition of Terms Used in the Action Plan (sheet 1 of 11)

Administrative Record: The administrative record is the body of documents and information that is considered or relied upon in arriving at a final decision for a remedial action, removal action, corrective measure, interim measure, RCRA permit, or approved RCRA closure plan.

Agency (Agencies): unless otherwise specified, the State of Washington Department of Ecology and the U.S. Environmental Protection Agency.

Agency for Toxic Substances and Disease Registry: the agency under the Department of Health and Human Services, Public Health Service, that is responsible for conducting health assessments at Superfund sites for EPA. (see Section 7.7)

Agreement: The Hanford Federal Facility Agreement and Consent Order, including all attachments, addenda and modifications, which are required to be written and to be incorporated into or appended.

Applicable or Relevant and Appropriate Requirement (ARAR): any standard, requirement, criteria or limitation as provided in Section 121(d)(2) of CERCLA. (see Section 7.5)

Authority: legal jurisdiction enabling a governmental agency to administer and implement federal or state laws and regulations.

B Plant: old Hanford plutonium recovery and separations facility converted in 1968 for waste fractionation.

Base RCRA Program: those elements of the federal Resource Conservation and Recovery Act of 1976, as amended, for which the state of Washington has received authorization to implement. The state implements its own dangerous waste program in lieu of the base RCRA program.

Burial Ground: land area specifically designated to receive contaminated waste packages and equipment, usually in trenches covered with overburden.

Carbon Tetrachloride: a chlorinated organic solvent used in the plutonium extraction process at the Plutonium Finishing Plant. Carbon tetrachloride is a known human liver carcinogen via inhalation and ingestion. Other toxic effects include central nervous system damage.



## APPENDIX A

### Definition of Terms Used in the Action Plan (sheet 2 of 11)

Chromium: an inorganic element, found in the environment in two forms: hexavalent and trivalent. Hexavalent chromium is carcinogenic via inhalation; hexavalent and trivalent chromium are less toxic via ingestion. Hexavalent chromium is a primary contaminant in groundwater beneath the 100 Area at Hanford.

CERCLA Past Practice (CPP): a process by which a past practice unit containing hazardous substances will be addressed for remedial action (as opposed to RCRA past practice). (see Section 7.3)

Code of Federal Regulations (CFR): regulations developed by the federal government to implement statutory requirements.

Community Relations Plan (CRP): a report that assesses and defines a community's informational needs concerning potential hazards posed by conditions at hazardous waste sites. The CRP also encourages and ensures two-way communication between an affected community and the public agency overseeing the site cleanup. (see Section 10.0)

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), also known as Superfund: the federal statute enacted in 1980 and reauthorized in 1986, which provides the statutory authority for cleanup of hazardous substances that could endanger public health or welfare or the environment.

Conceptual Design Report: DOE's initial design phase for a new hazardous waste management or support unit at Hanford; a specific element necessary in DOE's planning and budget process.

Confined Aquifer: an aquifer having defined, relatively impermeable upper and lower boundaries and the pressure of which is significantly greater than atmospheric.

Contamination (Groundwater and Surface Water): an impairment of quality by biological, chemical, or radiological materials that lowers the water quality to a degree which creates a potential hazard to the environment, public health, or interferes with a beneficial use.

Corrective Measures Implementation (CMI): the step in RCRA past practice process in which a corrective action system is designed and implemented; comparable to the Remedial Design and Remedial Action phases of the CERCLA process. (see Section 7.4)

## APPENDIX A

### Definition of Terms Used in the Action Plan (sheet 3 of 11)

- Corrective Measures Study (CMS): the step in the RCRA past practice process in which alternatives for a corrective action system are investigated and screened; comparable to the Feasibility Study phase of the CERCLA process. (see Section 7.4)
- Crib: an underground structure designed to receive liquid waste that can percolate into the soil directly and/or after travelling through a connected tile field.
- Cyanide: an extremely hazardous substance used in the extraction of ores, treat of metals, and in the manufacture of pharmaceuticals.
- Dangerous Waste (DW): those solid wastes designated in WAC 173-303-070 through 173-303-103 as dangerous or extremely hazardous wastes.
- Days: calendar days, unless otherwise specified. Any submittal, Written Notice of Position or written statement of dispute that would be due under the terms of this Agreement on a Saturday, Sunday or federal or state holiday shall be due on the following business day.
- Decontamination and Decommissioning (D&D)-(as defined by DOE Order 5840.2 for the D&D Program):
- Decontamination: the removal of radioactive contamination from facilities, equipment, or soils by washing, heating, chemical or electrochemical action, mechanical cleaning, or other techniques.
  - Decommissioning: actions taken to reduce the potential health and safety impacts of DOE contaminated facilities, including activities to stabilize, reduce, or remove radioactive materials or to demolish the facilities.
- Definitive Design: DOE's design phase in which detailed construction drawings and specifications are prepared following conceptual design for a new, or modification to a facility or unit.
- Double Shell Tank (DST): a reinforced concrete underground vessel with two inner steel liners to provide containment and backup containment of liquid wastes; annulus is instrumented to permit detection of leaks from inner liner.
- Extremely Hazardous Waste (EHW): those solid wastes designated in WAC 173-303-070 through 173-303-103 as dangerous or extremely hazardous wastes.

## APPENDIX A

### Definition of Terms Used in the Action Plan (sheet 4 of 11)

Fast Flux Test Facility (FFTF): A liquid metal test reactor that serves as a test tool for advanced reactor technology. Operations at the FFTF began in April 1982 and have since expanded into other areas, such as fusion research, space power systems and isotope production.

Feasibility Study (FS): the step in the CERCLA process in which alternatives for a remedial action system are investigated and screened (see Section 7.3).

Fiscal Year (FY): as used in this document, the federal government fiscal year, October 1 through September 30. Note that the State of Washington fiscal year is July 1 through June 30.

French Drain: a rock-filled encasement with an open bottom to allow seepage of liquid waste into the ground.

Groundwater: water which fills the spaces between soil, sand, rock, and gravel particles beneath the earth's surface. Rain that does not immediately flow to streams and rivers slowly percolates down through the soil to a point of saturation to form groundwater reservoirs. Groundwater flows at a very slow rate, compared to surface water, along gradients which often lead to river systems. If occurring in significant quantities, groundwater can be withdrawn for domestic, industrial, and agricultural purposes.

Grout: a fluid mixture of cementitious materials and liquid waste that sets up as a solid mass and is used for waste fixation and immobilization. The Hanford Grout facility will be regulated under the RCRA program.

Grout Campaign: the complete filling of one vault with treated waste/grout mixture.

Hanford Operable Units Report: documents the assignment of individual units to operable units and provides the rationale and justification for the prioritization of the operable units for the remedial investigation process.

Hanford Site: also referred to as "Hanford" or "Site", the approximately 560 square miles in Southeastern Washington State, excluding leased lands, and State and Bonneville Power Administration owned lands, which is owned by the United States and which is commonly known as the Hanford Reservation (Figure 7-1 in the Action Plan). This definition is not intended to limit CERCLA or RCRA authority regarding hazardous wastes, substances, pollutants or contaminants which have migrated off the Hanford Site.

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## APPENDIX A

### Definition of Terms Used in the Action Plan (sheet 5 of 11)

Hanford Site Waste Management Units Report (HSWMUR): document listing all known waste management units at Hanford and summarizes the wastes handled, dates of use and other information about each unit. (see Section 3.5)

Hanford Waste Vitrification Plant (HWVP): a facility to be constructed for treatment of high level liquid radioactive waste. Liquids are vitrified or glassified in order to reduce the potential for radioactive and hazardous contamination leaching into the environment. This unit will be regulated under RCRA.

Hazardous and Solid Waste Amendments of 1984, P.L. 98-616 (HSWA): the reauthorization of the RCRA program, enacted by Congress on November 8, 1984.

Hazardous Substance: substances regulated under CERCLA, as defined in CERCLA Sec. 101(14).

Hazardous Waste: those wastes included in the definitions of RCRA 1004(5) and RCW 70.105.010(15).

Hazardous Waste Constituent, also referred to as "hazardous constituent" or "constituent": a constituent that caused the Administrator of the Environmental Protection Agency to list the hazardous waste in 40 CFR Part 261, Subpart D or a constituent listed in Table 1 of 40 CFR 261.24. (Hazardous constituents are listed in 40 CFR Part 261, Appendix VIII).

Hazardous Waste Management Act (HWMA): the Hazardous Waste Management Act, codified at Ch. 70.105 RCW, and its implementing regulation at Ch. 173-303 Washington Administrative Code. (A state program, commonly referred to as the State Dangerous Waste Program, which regulates the generation, treatment, storage and/or disposal of hazardous wastes in cooperation with RCRA).

Imminent and Substantial Endangerment: a situation in which the lead regulatory agency and DOE immediately respond to a release of a hazardous substance or hazardous waste in order to abate the danger or threat to public health or welfare or the environment. Such action may be taken under CERCLA, RCRA, or HWMA authority, as appropriate.

## APPENDIX A

### Definition of Terms Used in the Action Plan (sheet 6 of 11)

- In-Situ Vitrification (ISV): a process by which electrical current is passed through contaminated soils in-place heating the soil to a molten state. While cooling the soils become a homogenous glass-like block thereby minimizing the leachability of contaminants.
- Interim Isolation (as pertains to Single-Shell Tanks): disconnecting and blanking or capping pipelines from SST systems and installing barriers to avoid inadvertent liquid addition.
- Interim Measure (IM): an expedited action taken under RCRA authority to mitigate a hazardous waste release or to reduce the potential for a future release from a unit. (see Section 7.2.4)
- Interim Response Action (IRA): an expedited action taken under CERCLA authority to mitigate a hazardous substance release or to reduce the potential for a future release from a unit. (see Section 7.2.4)
- Interim Stabilization (as pertains to Single-Shell Tanks): is the removal of pumpable supernatant and interstitial liquid from SST systems into DST systems. As much liquid as practicable will be removed. Supernatant is free standing liquid. Interstitial liquid is that liquid in the waste matrix contained within the pore spaces of the salts and sludges, some of which is capable of gravity drainage while the rest is held by capillary forces.
- Interim Status: a RCRA provision which grants a facility the right to continue to operate (treat, store, or dispose of hazardous waste) in accordance with applicable RCRA or state regulations until a RCRA permit is issued.
- Land Disposal Restriction Waste (LDR): RCRA hazardous wastes, subject to Section 3004(d) through (m) of RCRA and 40 CFR 268.
- Lead Regulatory Agency: the regulatory agency (EPA or Ecology) which is assigned the primary administrative and technical responsibility with respect to actions under this Agreement at a particular Operable Unit pursuant to Section 5.6 of the Action Plan. The designation of a Lead Regulatory Agency shall not change the jurisdictional authorities of the Parties.
- National Oil and Hazardous Substances Pollution Contingency Plan (NCP): the title of the federal regulations (40 CFR Part 300) promulgated under the authority of CERCLA.

## APPENDIX A

### Definition of Terms Used in the Action Plan (sheet 7 of 11)

National Priorities List (NPL): EPA's list of priority waste sites containing hazardous substances that will be investigated and cleaned up under the Superfund program.

Notice of Deficiency (NOD): a RCRA administrative action in which the lead regulatory agency defines specific deficiencies or omissions in RCRA primary documents. (see Section 9.2)

Operable Unit: a discrete portion of the Hanford Site, as identified in Section 3.3 of the Action Plan. An operable unit at Hanford is a group of land disposal sites placed together for the purposes of doing a Remedial Investigation/ Feasibility Study (RI/FS) and subsequent cleanup actions. The primary criteria for placement of a site into an operable unit includes geographic proximity, similarity of waste characteristics and site type, and the possibility for economies of scale.

Parties: the U.S. Environmental Protection Agency, the State of Washington Department of Ecology, and the U.S. Department of Energy, all of which are signing the Agreement and Action Plan.

Plutonium Uranium Extraction (PUREX): latest in a line of separation technologies, preceded by bismuth phosphate and REDOX.

Preliminary Assessment and Site Inspection (PA/SI): normally the first step in analyzing the nature and severity of contamination at a potential CERCLA site and is used to determine if a site should be nominated for the NPL. Based upon extensive documentation previously submitted to EPA by DOE, this requirement is considered to have been satisfied for the Hanford Site.

Primary Documents: documents which contain information, documentation, data, and proposals upon which key decisions will be made with respect to the remedial action or permitting process. Primary documents are subject to dispute resolution and are part of the administrative record. (see Section 9.2)

Project Manager: the individual responsible for implementing the terms and conditions of the Agreement and Action Plan on behalf of his/her respective Party. EPA, DOE, and Ecology will each designate one Project Manager. (see Section 4.1)

Quality Assurance (QA): the systematic actions necessary to provide adequate confidence that a material, component, system, process, or facility performs satisfactorily, or as planned in service.

## APPENDIX A

### Definition of Terms Used in the Action Plan (sheet 8 of 11)

Quality Control (QC): the quality assurance actions that control the attributes of a material, process, component, system, or facility in accordance with predetermined quality requirements.

Radioactive Mixed Waste: also called "mixed waste", wastes that contain both hazardous waste subject to RCRA, as amended, and radioactive waste subject to the Atomic Energy Act of 1954, as amended. Mixed waste is regulated under the State Dangerous Waste Program.

Radioactive Waste: a solid, liquid, or gaseous material of negligible economic value that contains radionuclides in excess of threshold quantities except for radioactive material from post-weapons-test activities.

Record of Decision (ROD): the CERCLA document used to select the method of remedial action to be implemented at a site after the Feasibility Study/Proposed Plan process has been completed. (see Section 7.3)

Remedial Action (RA): the CERCLA process of remedial action implementation after the investigative steps have been completed and after issuance of the Record of Decision and after Remedial Design has been completed. (see Section 7.3)

Remedial Design (RD): the CERCLA process of design for the remedial action alternative that was selected in the Record of Decision. (see Section 7.3)

Remedial Investigation (RI): the CERCLA process of determining the extent of hazardous substance contamination and, as appropriate, conducting treatability investigations. The RI is done in conjunction with the Feasibility Study. (see Section 7.3)

Resource Conservation and Recovery Act (RCRA): 42 U.S.C. Sec. 6901 et seq., as amended. For purposes of this Agreement, "RCRA" also includes the HWMA Ch. 70.105 RCW. (A federal law enacted in 1976 that regulates the generation, transportation, treatment, storage, and disposal of hazardous wastes).

Responsiveness Summary: a summary of oral and/or written public comments received during a comment period on key documents, and agency responses to those comments. The responsiveness summary is especially valuable during the decision process at a site, because it highlights community concerns about the proposed decision.

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## APPENDIX A

### Definition of Terms Used in the Action Plan (sheet 9 of 11)

RCRA Facility Assessment (RFA): the initial RCRA process to determine whether corrective action for a RCRA past practice unit is warranted, or to define what additional data must be gathered to make this determination; analogous to a CERCLA Preliminary Assessment and Site Inspection (see Section 7.4)

RCRA Facility Investigation (RFI): the RCRA process of determining the extent of hazardous waste contamination; analogous to the CERCLA Remedial Investigation. (see Section 7.4)

RCRA Past Practice (RPP): a process by which a past practice unit containing hazardous wastes or hazardous constituents will be addressed for corrective action, regardless of the date waste was received or discharged at a unit. (see Section 7.4)

RCRA Permit: a permit under RCRA and/or HWMA for treatment, storage or disposal of hazardous waste.

Revised Code of Washington (RCW): the Washington State statutes.

Secondary Document: as distinguished from Primary Document, it is considered to be a supporting document providing information or data and does not, in itself, reflect key decisions. A secondary document is subject to review by the regulatory agencies and is part of the administrative record. It is not subject to dispute resolution. (see Section 9.2)

Single-Shell Tank (SST): at Hanford, 149 single-shell carbon steel tanks (ranging in size from 55,000 to 1 million gallons) that have been used to store high-level radioactive wastes.

State of Washington Department of Ecology (Ecology): the State of Washington Department of Ecology, its employees and Authorized Representatives.

State-only Wastes: any liquid, solid, gas or sludge, regardless of quantity that exhibits any of the physical, chemical, or biological properties described in WAC 173-303-070 through 103.

Superfund Amendments and Reauthorization Act of 1986 (SARA): the reauthorization of the CERCLA statute, enacted by Congress in December 1986.



## APPENDIX A

### Definition of Terms Used in the Action Plan (sheet 10 of 11)

Support Agency: the regulatory agency (EPA or Ecology) which is not designated as the lead regulatory agency at an operable unit. The support agency will provide assistance to the lead regulatory agency, as needed.

Technical Assistance Grant (TAG): a grant available from EPA designed to enhance public participation as described in Section 117 of CERCLA. A maximum of \$50,000 per NPL site is available. Grant money must be used for the purpose of interpreting information regarding CERCLA activity at the site.

Treatment, Storage, or Disposal (TSD): a RCRA term referring to the treatment, storage, or disposal of hazardous waste. Under RCRA, TSD activity can occur only at units which received or stored hazardous waste after November 19, 1980, the effective date of the RCRA regulations.

Treatment, Storage, or Disposal (TSD) Group: a grouping of TSD units for the purpose of preparing and submitting a permit application and/or closure plan pursuant to the requirements under RCRA, as determined in the Action Plan.

Treatment, Storage, or Disposal (TSD) Unit: a unit used for treatment, storage, or disposal of hazardous waste and is required to be permitted and/or closed pursuant to RCRA requirements as determined in this Action Plan.

Unit Manager: the individual responsible for implementing the terms and conditions of the Action Plan at the operable unit level on behalf of his/her respective Party.

United States Department of Energy (DOE): the United States Department of Energy, its employees and Authorized Representatives.

United States Environmental Protection Agency (EPA): the United States Environmental Protection Agency, its employees and Authorized Representatives.

Unplanned Release: an unintentional release, including a spill, of hazardous waste or hazardous substance into the environment.

Vadose Zone: the unsaturated region of soil between the ground surface and the water table.

Validated Data: Data that DOE has determined meets criteria contained in the "Data Validation Guidelines for Contract Laboratory Program Organic Analyses" and "Data Validation Guidelines for Contract Laboratory Program Inorganic Analyses" that are contained in the Sample Management Administrative Manual.

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## APPENDIX A

### Definition of Terms Used in the Action Plan (sheet 11 of 11)

Verified Data: Data that has been checked for accuracy and consistency by DOE following a transfer action (e.g., from manual log to computer or from distributed data base to centralized data repository).

Vitrification: [see Hanford Waste Vitrification Plant (HWVP) or In-Situ Vitrification.]

Washington Administrative Code (WAC): the Washington State regulations.

Waste Information Data System (WIDS): a data base which identifies all waste management units on the Hanford Site. It describes the current status of each unit, along with descriptive information. (see Section 3.5)

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## APPENDIX A

### Definition of Other Technical Terms (sheet 1 of 7)

Note: These terms are not considered part of the Action Plan, but are provided to the reader for informational purposes only.

**Absorption:** the process by which radiation imparts some or all of its energy to any material through which it passes; the taking up of a substance by another substance.

**Alpha-Emitter:** a radioactive substance, such as plutonium, that emits alpha particles. Alpha radiation is much less penetrating than gamma or beta radiation, but is much more ionizing, and therefore potentially extremely toxic.

**Aquifer:** a geologic formation, group of formations, or part of a formation capable of yielding significant quantities of groundwater to wells, springs, or other points of discharge.

**Aquifer System:** a logical grouping of aquifers in a region, grouped on the basis of characteristics such as superficial geology, water quality, and vulnerability.

**Annulus:** also called "annular space", this is the space between the outer and inner casing of a well, or the space between the wall of the drilled hole and the casing.

**As Low As Reasonably Achievable (ALARA):** A radiation protection principle applied to radiation exposure, with costs and benefits taken into account.

**Background Water Quality:** the natural levels of chemical, physical, biological, and radiological constituents or parameters upgradient of a unit, practice, or activity that have not been affected by that unit, practice, or activity.

**Barrier:** a manmade addition to a disposal site that is designed to retard or preclude contaminant transport and/or to preserve the integrity of the disposal site.

**Basalt:** a dark, fine-grained, extrusive igneous rock.

**Basalt Waste Isolation Project (BWIP):** program to study Hanford as a possible location for the high-level nuclear waste repository.

## APPENDIX A

### Definition of Other Technical Terms (sheet 2 of 7)

- Beneficial Uses: uses of waters of the state that include but are not limited to use for domestic water, irrigation, agriculture, fish, shellfish, recreation, industrial water, and generation of electric power.
- Beta Radiation: essentially weightless charged particles (electrons or positrons) emitted from the nucleus of atoms undergoing nuclear transformation.
- Bottoms (tank bottoms): the concentrated material remaining in the waste tanks after most of the contents have been pumped out for solidification or transfer to other storage tanks; refers also to specific tanks used to collect such bottoms waste from several other tanks.
- Byproduct Material: waste produced by extraction or concentration of uranium or thorium from any ore processed primarily for its source material content, including discrete surface waste resulting from uranium solution extraction processes; excludes fission products and other radioactive material covered in 10 CFR Part 20.3(3).
- Cold Standby: a condition whereby a reactor is defueled and maintained in a state that will allow the reactor to be restarted, if necessary.
- Criteria: numerical or narrative values which represent the maximum level a contaminant must not exceed to maintain a given beneficial use.
- Curie (Ci): the basic unit used to describe the intensity of radioactivity. A curie is equal disintegrations to 37 billion pr second.
- Defense Waste: radioactive waste from any activity performed in whole or in part in support of DOE atomic energy defense activities; term excludes waste under purview of the Nuclear Regulatory Commission or generated by the commercial nuclear power industry.
- Ditch: an unlined conveyance for transport of liquid wastes to a pond or trench structure designed for percolation.
- Drywell: a drainage receptable constructed by digging a hole and refilling with coarse gravel; also a watertight well casing used for inserting monitoring equipment.
- Enforcement Standard: the value assigned to any contaminant for the purposes of regulating that contaminant.

## APPENDIX A

### Definition of Other Technical Terms (sheet 3 of 7)

Ethylene Glycol: an organic compound used primarily as an anti-freeze.  
Ethylene glycol is moderately toxic when ingested.

Evapotranspiration: the combined loss of water from soil by evaporation and from the surfaces of plant structures.

Half-life: the time required for a radionuclide's activity to decay to half its value, used as a measure of the persistence of radioactive materials; each radionuclide has a characteristic constant half-life.

Halogenated Hydrocarbons: organic compounds containing atoms such as chlorine, fluorine, iodine, or bromine.

Hydraulic Continuity: a term used to describe the relationship between groundwater and surface water, wherein they are often connected, allowing flow in either or both directions.

Iodine: a gaseous inorganic chemical produced in the plutonium production reactors at Hanford. Radioactive isotopes of iodine are found in most radioactive waste streams at Hanford.

Ion Exchange: process for selectively removing a hazardous constituent from a waste stream by reversibly transferring ions between an insoluble solid and the waste stream; the exchange medium (usually from a column of resin) can then be washed to collect the waste or taken directly to disposal. Both the residue and liquid stream from this process may still be a hazardous waste.

Isotope: any of two or more forms of a chemical with the same atomic number and nearly identical chemical behavior but different atomic mass and physical (e.g. radioactive) properties.

Jet Pumping: a technique for removing interstitial liquor from single-shell tanks.

Leachate: the product obtained from the passage of water through landfills or storage piles.

## APPENDIX A

### Definition of Other Technical Terms (sheet 4 of 7)

Lead: a heavy metal used for shielding material in nuclear reactors. Lead can be toxic when ingested or inhaled. Lead can impair nervous system development in children and can cause nervous system damage in adults. Lead is also a reproductive toxin.

Level of Detection: the level at which a constituent can be detected by a department approved method of analysis.

Liquid Waste Disposal Site: units used for discharge of contaminated liquids to the ground.

Low-Level Waste (LLW): typically contains small amounts of radioactivity in large volumes, and most can be handled without protective shielding. Solid low-level waste consists of trash such as clothing, tools, and glassware. Liquid waste consists primarily of water circulated as cooling water.

Lysimeter: an instrument for measuring the water percolating through soils and determining the materials dissolved by the water.

Maximum Contaminant Level (MCL): the maximum level of a contaminant in water that can exist without harming the beneficial use of drinking water. Defined specifically in the Safe Drinking Water Act.

N-Reactor: N-Reactor is a dual purpose reactor, generating electricity from its steam by-product in addition to producing plutonium. It is the only plutonium production reactor at Hanford that has operated since 1971. It is currently in standby status.

National Pollutant Discharge Elimination System (NPDES): grants authority to EPA and authorized states to issue permits for discharge of wastewaters into certain surface water bodies within prescribed limits for constituents, concentrations and volumes.

Percolation: gravity flow of water through pore spaces in rock or soil.

pH: a measure of acidity and alkalinity.

Plume: a defined area of groundwater contamination.

Plutonium: a radioactive element used as the primary fuel in nuclear weapons. Plutonium is purified during various production operations at Hanford.

## APPENDIX A

### Definition of Other Technical Terms (sheet 5 of 7)

Point of Compliance: a RCRA term, the point at which the groundwater protection standard applies and where monitoring must be conducted. The point of compliance is a vertical surface located at the hydraulically downgradient limit of the waste management area that extends down into the uppermost aquifer underlying the regulated units.

Ponds: surface impoundments used to contain low-level liquid radioactive wastes, mixed wastes, or hazardous wastes.

Receptor: any living entity potentially affected by release of substances to the environment from Hanford operations.

Recharge: the net process of groundwater replenishment by infiltration of surface water through the soil column. Sources of recharge include precipitation and surface runoff from natural and man-made water courses and impoundments.

Reduction/Oxidation (REDOX): a facility and/or processes for separating plutonium from irradiated reactor fuels by using successive steps of chemical reduction/oxidation together with solvent extraction.

Reverse Well: liquid waste disposal structure consisting of a well (sometimes drilled into the water table) into which waste solutions were pumped.

Salt Cake: crystallized nitrate and other salts deposited in waste tanks, usually after active measures are taken to remove moisture.

Sanitary Landfill: a burial operation for disposing of nonradioactive, nonhazardous waste or garbage.

Saturated Zone: the subsurface zone in which all interconnected voids or pores are filled with water.

Seepage Pond: an artificial body of surface water formed by discharge from Hanford process operations.

Solid Waste (radioactive): either solid radioactive material or solid objects that contain radioactive material or bear radioactive surface contamination.

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## APPENDIX A

### Definition of Other Technical Terms (sheet 6 of 7)

- Stabilization: treatment of waste or a waste site to protect the environment from contamination.
- State Waste Discharge Permit: a permit issued pursuant to Chapter 173-216 WAC.
- Strontium 90: a highly radioactive isotope common in most radioactive waste streams at Hanford.
- Sulfuric Acid: a highly corrosive inorganic acid used in various production processes at Hanford.
- Surplus Facility: any facility or site (including equipment) that has no identified programmatic use and may or may not be radioactively contaminated to levels that require controlled access.
- Synthetic Organic: man-made chemical compounds that contain carbon and may be highly persistent in the environment.
- Tank Farm: an installation of multiple adjacent tanks, usually interconnected, for storage of liquid waste, or substances used in Hanford operations. Major tank farms at Hanford at underground.
- Transuranic (TRU) Waste: waste contaminated with long-lived transuranic elements in concentrations within a specified range established by DOE, EPA, and the Nuclear Regulatory Commission (NRC). These are elements shown above uranium on the chemistry periodic table, such as plutonium, americium, and neptunium.
- Trend Analysis: a statistical methodology used to detect net changes or trends in contaminant levels over time.
- Tritium: a radioactive isotope of hydrogen used in nuclear weapons to increase the efficiency of the nuclear reaction.
- Tunnel: a large underground storage structure for large pieces of equipment, often on railroad cars; PUREX storage tunnels.
- Unconfined Aquifer: an aquifer overlain with permeable material and sensitive to contamination; also, an aquifer that has a water table or surface at atmospheric pressure.
- Vault: a RCRA approved, subsurface structure designed for permanent disposal of low-level mixed wastes in grout.



## APPENDIX A

### Definition of Other Technical Terms (sheet 7 of 7)

Washington Guidance Level (WGL): an interim health level for a contaminant which does not have an established criterion but which may create a public health hazard. A WGL is based on less stringent development processes than a criterion and is meant to act as an enforcement guide until a criterion is established. WGL will be based on the most current available data which may include, but not be limited to: (a) USEPA Maximum Contaminant Level Goals, (b) USEPA Priority Pollutant Values, (c) USEPA Ambient Water Quality Criteria, (d) USEPA Health Advisories, (e) Other States criteria or Guidance Levels, and (f) Department of Social and Health Services Health Risk Assessments.

Water Table: the upper boundary of an unconfined aquifer surface below which soil saturated with groundwater occurs; defined by the levels at which water stands in wells that barely penetrate the aquifer.

200 Areas Plateau: the highest portion (aside from Rattlesnake and Gable Mountains) on the Hanford Site, containing most of the waste processing and storage facilities.

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## APPENDIX B

## Listing of Treatment, Storage, and Disposal Groups/Units. (sheet 1 of 11)

Treatment, Storage, and Disposal			Planned Action	
Group Number	Group/Units	Operable Unit (if applicable)	Closure*	Operating Permit
D-1-1	100-D Ponds (120-D-1)	100-DR-1	X	
T-1-1	105-DR (122-DR-1) Sodium Fire Facility		X	
D-1-2	1301-N/1325-N Liquid Waste Disposal Facilities	100-NR-1	X	
	116-N-1 Crib			
	116-N-3 Crib			
T-1-2	1324-N/1324-NA Liquid Waste Facilities	100-NR-1	X	
	120-N-1 Pond			
	120-N-2 Neutralization Unit			
T-1-3**	1706-KE Treatment Facility (116-KE6 A-D):		X	
	1706-KE Waste Accumulation Tank			
	1706-KE Ion Exchange Column			
	1706-KE Solidification Unit (Evaporator)			
	1706-KE Condensate Tank			

## APPENDIX B

## Listing of Treatment, Storage, and Disposal Groups/Units. (sheet 2 of 11)

Treatment, Storage, and Disposal			Planned Action	
Group Number	Group/Units	Operable Unit (if applicable)	Closure*	Operating Permit
T-1-4	183-H Solar Evaporation Basins (116-H-6)	100-HR-1	X	
S-2-8	200 East Area Liquid Effluent Retention Facility (LERF)			Storage
T-2-1	200-E8 Borrow Pit Demolition Site		X	
T-2-2	200-W Ashpit Demolition Site		X	
T-2-3***	204-AR Waste Unloading Station			Treatment
S-2-7	207-A South Retention Basin	200-PO-5	X	
D-2-1	2101-M Pond		X	
D-2-2	216-A-10 Crib	200-PO-2	X	
D-2-3	216-A-29 Ditch	200-PO-5	X	
D-2-4	216-A-36B Crib	200-PO-2	X	
D-2-10	216-A-37-1 Crib	200-PO-4	X	
D-2-5	216-B-3 Pond System:	200-BP-11	X	
	216-B-3 Pond			
	216-B-3A Pond			
	216-B-3B Pond			
	216-B-3C Pond			
	216-B-3-3 Ditch			

## APPENDIX B

## Listing of Treatment, Storage, and Disposal Groups/Units. (sheet 3 of 11)

<u>Treatment, Storage, and Disposal</u>			<u>Planned Action</u>	
Group Number	Group/Units	Operable Unit (if applicable)	Closure*	Operating Permit
S-2-3	Double-Shell Tanks			Storage
	241-AN Farm (7 tanks)			
	241-AP Farm (8 tanks)			
	241-AW Farm (6 tanks)			
	241-AY Farm (2 tanks/2 diversion boxes)			
	241-AZ Farm (2 tanks)			
	241-SY Farm (3 tanks)			
	241-EW-151 Vent Station Catch Tank			
	244-AR Vault			
	244-CR Vault			
	244-TX Receiver Tank			
	244-BX Receiver Tank			
	244-U Receiver Tank			
	244-S Receiver Tank			
	244-A Receiver Tank			
S-2-9	241-CX-70 Tank	200-SO-1	X	
D-2-6	216-B-63 Trench	200-BP-8	X	
D-2-7	216-S-10 Pond and Ditch	200-RO-1	X	
	216-S-10D Ditch			
	216-S-10P Pond			

## APPENDIX B

## Listing of Treatment, Storage, and Disposal Groups/Units. (sheet 4 of 11)

Treatment, Storage, and Disposal			Planned Action	
Group Number	Group/Units	Operable Unit (if applicable)	Closure*	Operating Permit
D-2-8	216-U-12 Crib	200-UP-2	X	
D-2-9	Low-Level Burial Grounds			
	218-E-10			Landfill
	218-E-12B			Landfill
	218-W-3A			Landfill
	218-W-3AE			Landfill
	218-W-4B			Landfill
	218-W-4C			Landfill
	218-W-5			Landfill
	218-W-6			Landfill
S-2-1	Purex Tunnels 1 and 2			Storage
	218-E-14			
	218-E-15			
T-2-4**	221-T Containment System Test Facility		X	
TS-2-1	222-S Laboratories Treatment Tanks and Storage Building			
	222-S Storage Pad			Storage
	*** 219-S Hot Waste Facility Tank 102			Treatment
	*** 219-S Hot Waste Facility Tank 103			Treatment

## APPENDIX B

## Listing of Treatment, Storage, and Disposal Groups/Units. (sheet 5 of 11)

Treatment, Storage, and Disposal			Planned Action	
Group Number	Group/Units	Operable Unit (if applicable)	Closure*	Operating Permit
S-2-2	224-T Transuranic Storage and Assay Facility (TRUSAF)			Storage
S-2-4	Single-Shell Tanks		X	
	241-A Farm (6 tanks/2 diversion boxes)	200-PO-3		
	241-AX Farm (4 tanks/1 diversion box)	200-PO-3		
	241-B Farm (16 tanks/5 diversion boxes)	200-BP-7		
	241-BX Farm (12 tanks/6 diversion boxes)	200-BP-7		
	241-BY Farm (12 tanks/3 diversion boxes)	200-BP-7		
	241-C Farm (16 tanks/6 diversion boxes)	200-PO-3		
	241-S Farm (12 tanks/2 diversion boxes)	200-RO-4		
	241-SX Farm (15 tanks/2 diversion boxes)	200-RO-4		
	241-T Farm (16 tanks/6 diversion boxes)	200-TP-6		
	241-TX Farm (18 tanks/4 diversion boxes)	200-TP-5		
	241-TY Farm (6 tanks/1 diversion boxes)	200-TP-5		
	241-U Farm (16 tanks/8 diversion boxes)	200-UP-3		
T-2-5***	241-Z Treatment Tank (D-5)			Treatment
T-2-6	242-A Evaporator			Treatment
S-2-5	2727-S Nonradioactive Dangerous Waste Storage Facility		X	

## APPENDIX B

Listing of Treatment, Storage, and Disposal Groups/Units. (sheet 6 of 11)

Treatment, Storage, and Disposal			Planned Action	
Group Number	Group/Units	Operable Unit (if applicable)	Closure*	Operating Permit
TS-2-2	Hexone Storage and Treatment		X	
	276-S-141 Tank			
	276-S-142 Tank			
	Railcar Storage Tanks (Future)			
	Distillation System (Future)			
	Incinerator (Future)			
T-3-1	300 Area Solvent Evaporator		X	
TS-3-1	300 Area Waste Acid System		X	
	313 Building Waste Acid Neutralization Tank			
	313 Building Centrifuge			
	313 Filter Press			
	333 Building Chromium Treatment Tanks (2 tanks)			
	***311 Neutralized Waste Tanks (2 tanks)			
	334-A Waste Acid Storage Tank (2 tanks)			



## APPENDIX B

Listing of Treatment, Storage, and Disposal Groups/Units. (sheet 7 of 11)

<u>Treatment, Storage, and Disposal</u>			<u>Planned Action</u>	
Group Number	Group/Units	Operable Unit (if applicable)	Closure*	Operating Permit
S-3-1	303-K Contaminated Waste Storage Facility		X	
T-3-2	303-M Uranium Oxide Facility	300-FF-2	X	
TS-3-2	304 Concretion Facility and Storage Area		X	
	304 Concretion Facility			
	304 Storage Area			
S-3-2	305-B Storage Facility			Storage
D-3-1	300 Area Process Trenches (316-5)	300-FF-1	X	
T-3-3**	324 Sodium Removal Pilot Plant			Treatment
T-3-4	325 Waste Treatment Facility			Treatment

## APPENDIX B

## Listing of Treatment, Storage, and Disposal Groups/Units. (sheet 8 of 11)

Treatment, Storage, and Disposal			Planned Action	
Group Number	Group/Units	Operable Unit (if applicable)	Closure*	Operating Permit
TS-3-3	3718-F Alkali Metal Treatment and Storage Facility		X	
	3718-F Burn Shed			
	3718-F Treatment Tank #1			
	3718-F Treatment Tank #2			
	3718-F Alkali Metal Treatment Facility Storage			
T-4-1	400 Area Maintenance and Storage Facility (MASF)			Treatment
S-4-1	4843 FFTF Sodium Storage Facility		X	
D-6-1	600 Area Nonradioactive Dangerous Waste Landfill	200-IU-3	X	
S-6-1	616 Nonradioactive Dangerous Waste Storage Facility			Storage
TS-2-3	B Plant			
	B Plant Waste Concentrator			Treatment
	B Plant Settle and Decant Tank			Treatment
	B Plant Filter			Treatment
	B Plant Radioactive Organic Waste Solvent Tank #1			Storage

## APPENDIX B

## Listing of Treatment, Storage, and Disposal Groups/Units. (sheet 9 of 11)

<u>Treatment, Storage, and Disposal</u>			<u>Planned Action</u>	
Group Number	Group/Units	Operable Unit (if applicable)	Closure*	Operating Permit
	B Plant Radioactive Organic Waste Solvent Tank #2			Storage
	B Plant Radioactive Organic Waste Solvent Tank #3			Storage
	B Plant Radioactive Organic Waste Solvent Tank #4			Storage
	B Plant Radioactive Organic Waste Solvent Tank #5			Storage
	B Plant Radioactive Organic Waste Solvent Tank #6			Storage
	B Plant Radioactive Organic Waste Solvent Tank #7			Storage
	B Plant Storage Area			Storage
	B Plant Waste Pile			Storage
T-X-1	Biological Treatment Test Facilities			Treatment
TD-2-1	Grout			
	Grout Treatment Facility			Treatment
	Grout Treatment Facility Landfill			Treatment/Landfill
TS-2-4	Hanford Central Waste Complex			
	Waste Receiving and Processing (WRAP) Facility (Future)			Treatment
	Radioactive Mixed Waste Storage Facility			Storage

## APPENDIX B

## Listing of Treatment, Storage, and Disposal Groups/Units. (sheet 10 of 11)

<u>Treatment, Storage, and Disposal</u>			<u>Planned Action</u>	
Group Number	Group/Units	Operable Unit (if applicable)	Closure*	Operating Permit
TS-2-5	Hanford Waste Vittrification Plant (HWVP) (Future)			Treatment/Storage
T-X-2	Physical and Chemical Treatment Test Facilities			Treatment
TS-2-6	Purex			
	*** Neutralization Tank E-5			Treatment
	*** E-F11 Concentrator			Treatment
	*** Neutralization Tank G-7			Treatment
	Ammonia Distillate Treatment System (Future Tank)			Treatment
	*** Neutralization Tank F-18			Treatment
	*** Neutralization Tank F-15			Treatment
	*** Neutralization Tank F-16			Treatment
	*** Neutralization Tank U3			Treatment
	*** Neutralization Tank U4			Treatment
	Purex Waste Piles			Storage
TS-3-4	Simulated High-Level Waste Slurry Treatment and Storage		X (or)	Treatment/Storage

## APPENDIX B

## Listing of Treatment, Storage, and Disposal Groups/Units. (sheet.11 of 11)

<u>Treatment, Storage, and Disposal</u>			<u>Planned Action</u>	
Group Number	Group/Units	Operable Unit (if applicable)	Closure*	Operating Permit
T-2-7***	T Plant Treatment Tank			Treatment
T-X-3	Thermal Treatment Test Facilities			Treatment
T-11-1	1100 Area Hanford Patrol Academy Demolition Area		X	

\*Post-Closure Permit required if closed as a land disposal unit in accordance with Subsection 6.3.2.

\*\*Part A permit application may be withdrawn because unit(s) never handled or never will handle hazardous waste.

\*\*\*Part A permit application may be withdrawn due to reclassification of unit(s) as treatment by generator.

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## APPENDIX C

## Prioritized Listing of Operable Units. (sheet 1 of 28)

<u>Priority</u>	<u>Operable Unit</u>	<u>Title of Units</u>	<u>Unit Type</u>	<u>Lead Regulatory Agency</u>	<u>Unit Category</u>
1	1100-EM-1	1100-1	Acid Pit	EPA	CPP
		1100-2	Solvent Pit		CPP
		1100-3	Antifreeze Pit		CPP
		Horn Rapids	Landfill		CPP
		Disposal			
		1100-4	Antifreeze Tank		CPP
		UN-1100-5	Unplanned Release		CPP
		UN-1100-6	Unplanned Release		CPP
2	300-FF-1 (GW addressed by 300-FF-5)	300 Ash Pits	Pit	EPA	CPP
		300 Filter	Pond		CPP
		Backwash Pond			
		300 Retired Filter	Pond		CPP
		Backwash			
		300 Retired RLWS	Sewer		CPP
		300 Area RLWS	Sewer		CPP
		and 340 Complex			
		300 Area Sanitary	Sewer		CPP
		Sewer System			
		307	Retention Basin		CPP
		316-1	Pond		CPP
		316-2	Pond		CPP
		316-3	Trench		CPP
		316-5	Trench		CPP
		(300 Area Process Trenches)			TSD (D-3-1)
		618-12	Burial Ground		CPP
		618-4	Burial Ground		CPP
		618-5	Burial Ground		CPP
		628-4	Burn Pit		CPP
		UN-300-1	Unplanned Release		CPP
		UN-300-2	Unplanned Release		CPP
		UN-300-11	Unplanned Release		CPP
		UN-300-14	Unplanned Release		CPP
		UN-300-31	Unplanned Release		CPP
		UN-300-41	Unplanned Release		CPP
		UN-300-FF-1	Unplanned Release		CPP
2A	300-FF-5 (GW O.U.)	300-FF-1	Source O.U.	EPA	CPP
		300-FF-2	Source O.U.		CPP
		300-FF-3	Source O.U.		CPP

# APPENDIX C

## Prioritized Listing of Operable Units. (sheet 2 of 28)

Priority	Operable Unit	Title of Units	Unit Type	Lead Regulatory Agency	Unit Categor
3	200-BP-1 (Source O.U.)	216-B-43	Crib	EPA	CPP
		216-B-44	Crib		CPP
		216-B-45	Crib		CPP
		216-B-46	Crib		CPP
		216-B-47	Crib		CPP
		216-B-48	Crib		CPP
		216-B-49	Crib		CPP
		216-B-50	Crib		CPP
		216-B-57	Crib		CPP
		216-B-61	Crib		CPP
		UN-200-E-89	Unplanned Release		RPP
		UN-200-E-110	Unplanned Release		CPP
		UN-200-E-63	Unplanned Release		CPP
		UN-200-E-9	Unplanned Release		CPP
	100-HR-1 (GW addressed by 100-HR-3)	116-H-1	Trench	Ecology	RPP
		116-H-2	Trench		RPP
		116-H-3	French Drain		RPP
		116-H-4	Crib		RPP
		116-H-5	Outfall Structure		RPP
		116-H-6 (183-H)	Retention Basin		TSD (T-1-4)
		116-H-7	Retention Basin		RPP
		116-H-9	Crib		RPP
		126-H-2	Demolition and Inert Landfill		RPP
		132-H-1	Stack		RPP
		132-H-3	Pump Station		RPP
		1607-H2	Septic Tank		RPP
		1607-H3	Septic Tank		RPP
4A	100-HR-3 (GW O.U.)	100-HR-1	Source O.U.	Ecology	RPP
		100-HR-2	Source O.U.		RPP
		100-DR-1	Source O.U.		RPP
		100-DR-2	Source O.U.		RPP
		100-DR-3	Source O.U.		RPP



## APPENDIX C

## Prioritized Listing of Operable Units. (sheet 3 of 28)

<u>Priority</u>	<u>Operable Unit</u>	<u>Title of Units</u>	<u>Unit Type</u>	<u>Lead Regulatory Agency</u>	<u>Unit Category</u>
5	100-DR-1 (GW addressed by 100-HR-3)	116-D-1A	Trench	Ecology	RPP
		116-D-1B	Trench		RPP
		116-D-2	Crib		RPP
		116-D-3	French Drain		RPP
		116-D-4	French Drain		RPP
		116-D-5	Outfall Structure		RPP
		116-D-6	French Drain		RPP
		116-D-7	Retention Basin		RPP
		116-D-9	Crib		RPP
		116-D-10	Pit		RPP
		116-DR-1	Trench		RPP
		116-DR-2	Trench		RPP
		116-DR-5	Outfall Structure		RPP
		116-DR-9	Retention Basin		RPP
		120-D-1	Ponds		TSD (D-1-1)
		120-D-2	Storage Tank		RPP
		126-D-1	Ash Pit		RPP
		126-D-2	Demolition and Inert Landfill		RPP
		126-D-3	Brine Pit		RPP
		128-D-2	Burn Pit		RPP
		130-D-1	Storage Tank		RPP
		132-D-1	Building		RPP
		132-D-2	Building		RPP
		132-D-3	Pump Station		RPP
		1607-D2	Septic Tank		RPP
		1607-D4	Septic Tank		RPP
		1607-D5	Septic Tank		RPP
		628-3	Burn Pit		RPP
6	100-BC-1 (GW addressed by 100-BC-5)	116-B-1	Trench	EPA	CPP
		116-B-2	Trench		CPP
		116-B-3	Crib		CPP
		116-B-4	French Drain		CPP
		116-B-5	Crib		CPP
		116-B-6A	Crib		CPP
		116-B-6B	Crib		CPP
		116-B-7	Outfall Structure		CPP
		116-B-9	French Drain		CPP
		116-B-10	French Drain		CPP
		116-B-11	Retention Basin		CPP
		116-B-12	Crib		CPP
		116-B-13	Trench		CPP
		116-B-14	Trench		CPP
		116-B-15	Pit		CPP
		116-B-16	Storage Tank		CPP
		116-C-1	Trench		CPP
		116-C-5	Retention Basin		CPP

# APPENDIX C

## Prioritized Listing of Operable Units. (sheet 4 of 28)

Priority	Operable Unit	Title of Units	Unit Type	Lead Regulatory Agency	Unit Category
9413293-0238	100-BC-1 (GW addressed by 100-BC-5) (Continued)	118-B-5	Burial Ground		CPP
		118-B-7	Burial Ground		CPP
		118-B-10	Pit		CPP
		120-B-1	Sump		CPP
		126-B-1	Ash Pit		CPP
		126-B-2	Demolition and Inert Landfill		CPP
		126-B-3	Demolition and Inert Landfill		CPP
		126-B-4	Brine Pit		CPP
		128-B-1	Burning Pit		CPP
		128-B-2	Burning Pit		CPP
		128-B-3	Burning Pit		CPP
		128-C-1	Burning Pit		CPP
		132-B-1	Building		CPP
		132-B-3	Stack		CPP
		132-B-4	Building		CPP
		132-B-5	Building		CPP
		132-B-6	Outfall Structure		CPP
		132-C-2	Outfall Structure		CPP
		1607-B1	Septic Tank		CPP
		1607-B2	Septic Tank		CPP
		1607-B3	Septic Tank		CPP
		1607-B4	Septic Tank		CPP
		1607-B5	Septic Tank		CPP
		1607-B6	Septic Tank		CPP
		1607-B7	Septic Tank		CPP
6A	100-BC-5 (GW O.U.)	100-BC-1	Source O.U.	EPA	CPP
		100-BC-2	Source O.U.		CPP
		100-BC-3	Source O.U.		CPP
		100-BC-4	Source O.U.		CPP
7	100-KR-1 (GW addressed by 100-KR-4)	116-KE-4	Retention Basin	EPA	CPP
		116-KW-3	Retention Basin		CPP
		116-K-1	Crib		CPP
		116-K-2	Trench		CPP
		116-K-3	Outfall Structure		CPP
7A	100-KR-4 (GW O.U.)	100-KR-1	Source O.U.	EPA	CPP
		100-KR-2	Source O.U.		CPP
		100-KR-3	Source O.U.		CPP

## APPENDIX C

Prioritized Listing of Operable Units. (sheet 5 of 28)

<u>Priority</u>	<u>Operable Unit</u>	<u>Title of Units</u>	<u>Unit Type</u>	<u>Lead Regulatory Agency</u>	<u>Unit Category</u>
8	100-NR-1	116-N-1 (1301-N)	Crib	Ecology	TSD (D-1-2)
		116-N-2	Storage Tank		RPP
		116-N-3 (1325-N)	Crib		TSD (D-1-2)
		116-N-4	Septic Tank		
		118-N-1	Silos		
		120-N-1 (1324-N)	Pond		TSD (T-1-2)
		120-N-2 (1324-NA)	Neutralization Unit		TSD (T-1-2)
		120-N-3	French Drain		RPP
		120-N-5	Neutralization Unit		RPP
		120-N-6	French Drain		RPP
		120-N-7	French Drain		RPP
		120-N-8	French Drain		RPP
		124-N-1	Septic Tank		RPP
		124-N-2	Septic Tank		RPP
		124-N-3	Septic Tank		
		124-N-4	Septic Tank		RRP
		124-N-5	Septic Tank		RPP
		124-N-6	Septic Tank		RPP
		124-N-7	Septic Tank		RPP
		124-N-8	Septic Tank		RPP
		124-N-9	Septic Tank		RPP
		124-N-10	Sewer		RPP
		128-N-1	Burning Pit		RPP
		130-N-1	Pond		RPP
		UN-100-N-1	Unplanned Release		
		UN-100-N-2	Unplanned Release		RPP
		UN-100-N-3	Unplanned Release		
		UN-100-N-4	Unplanned Release		RPP
		UN-100-N-5	Unplanned Release		RPP
		UN-100-N-6	Unplanned Release		RPP
		UN-100-N-7	Unplanned Release		
		UN-100-N-8	Unplanned Release		RPP
		UN-100-N-9	Unplanned Release		RPP
		UN-100-N-10	Unplanned Release		
		UN-100-N-11	Unplanned Release		RPP
		UN-100-N-12	Unplanned Release		
		UN-100-N-13	Unplanned Release		RPP
		UN-100-N-14	Unplanned Release		RPP
		UN-100-N-15	Unplanned Release		RPP
		UN-100-N-17	Unplanned Release		RPP
		UN-100-N-18	Unplanned Release		RPP
		UN-100-N-19	Unplanned Release		RPP
		UN-100-N-20	Unplanned Release		RPP
		UN-100-N-21	Unplanned Release		RPP
		UN-100-N-22	Unplanned Release		RPP
		UN-100-N-23	Unplanned Release		RPP
		UN-100-N-24	Unplanned Release		RPP

# APPENDIX C

Prioritized Listing of Operable Units. (sheet 6 of 28)

<u>Priority</u>	<u>Operable Unit</u>	<u>Title of Units</u>	<u>Unit Type</u>	<u>Lead Regulatory Agency</u>	<u>Unit Category</u>
	100-NR-1	UN-100-N-25	Unplanned Release		RPP
	(Continued)	UN-100-N-26	Unplanned Release		RPP
		UN-100-N-29	Unplanned Release		
		UN-100-N-30	Unplanned Release		
		UN-100-N-31	Unplanned Release		RPP
		UN-100-N-32	Unplanned Release		
		UN-100-N-33	Unplanned Release		RPP
		UN-100-N-34	Unplanned Release		RPP
		UN-100-N-35	Unplanned Release		
		UN-600-N-17	Unplanned Release		RPP
	100-NR-2	100-NR-1	Source O.U.	Ecology	RPP
	(GW O.U.)				
	100-FR-1	116-F-1	Trench	EPA	CPP
		116-F-2	Trench		CPP
		116-F-3	Trench		CPP
		116-F-4	Crib		CPP
		116-F-5	Crib		CPP
		116-F-6	Trench		CPP
		116-F-7	French Drain		CPP
		116-F-8	Outfall Structure		CPP
		116-F-9	Trench		CPP
		116-F-10	French Drain		CPP
		116-F-11	French Drain		CPP
		116-F-12	French Drain		CPP
		116-F-13	French Drain		CPP
		116-F-14	Retention Basin		CPP
		116-F-15	Crib		CPP
		116-F-16	Outfall		CPP
		126-F-2	Demolition and Inert Landfill		CPP
		128-F-2	Burning Pit		CPP
		132-F-3	Building		CPP
		132-F-4	Stack		CPP
		132-F-5	Building		CPP
		132-F-6	Pump Station		CPP
		1607-F2	Septic Tank		CPP
		1607-F3	Septic Tank		CPP
		1607-F4	Septic Tank		CPP
		1607-F5	Septic Tank		CPP
		1607-F6	Septic Tank		CPP
		UN-100-F-1	Unplanned Release		CPP
10A	100-FR-3	100-FR-1	Source O.U.	EPA	CPP
	(GW O.U.)	100-FR-2	Source O.U.		CPP

# APPENDIX C

Prioritized Listing of Operable Units. (sheet 7 of 28)

Priority	Operable Unit	Title of Units	Unit Type	Lead Regulatory Agency	Unit Category
11	200-UP-2	200-W Powerhouse Pond	Pond	Ecology	CPP
		200 West Constr.	Burial Ground		CPP
		Surface Laydown Area			
		207-U	Retention Basin		CPP
		216-U-1&2	Crib		CPP
		216-U-3	French Drain		CPP
		216-U-4	Reverse Well		CPP
		216-U-4A	French Drain		CPP
		216-U-4B	French Drain		CPP
		216-U-5	Trench		CPP
		216-U-6	Trench		CPP
		216-U-7	French Drain		CPP
		216-U-8	Crib		CCP
		216-U-9	Ditch		
		216-U-10	Pond		
		216-U-11	Ditch		
		216-U-12	Crib		TSD (D-2-8)
		216-U-13	Trench		
		216-U-14	Ditch		CPP
		216-U-15	Trench		CPP
		216-U-16	Crib		CPP
		216-U-17	Crib		CPP
		216-Z-11	Ditch		
		216-Z-19	Ditch		
		216-Z-1D	Ditch		
		216-Z-20	Crib		
		241-U-361	Settling Tank		CPP
		241-UX-154	Diversion Box		CPP
		241-UX-302A	Catch Tank		CPP
		241-WR Vault	Vault		CPP
		270-W	Neutralization Tank		CPP
		2607-W5	Septic Tank		CPP
		2607-W7	Septic Tank		CPP
		2607-W9	Septic Tank		
		UN-200-W-19	Unplanned Release		CPP
		UN-200-W-33	Unplanned Release		CPP
		UN-200-W-39	Unplanned Release		CPP
		UN-200-W-46	Unplanned Release		CPP
		UN-200-W-48	Unplanned Release		CPP
		UN-200-W-55	Unplanned Release		CPP
		UN-200-W-60	Unplanned Release		CPP
		UN-200-W-68	Unplanned Release		
		UN-200-W-78	Unplanned Release		CPP
		UN-200-W-86	Unplanned Release		CPP
		UN-200-W-101	Unplanned Release		CPP
		UN-200-W-117	Unplanned Release		CPP

## APPENDIX C

Prioritized Listing of Operable Units. (sheet 8 of 28)

<u>Priority</u>	<u>Operable Unit</u>	<u>Title of Units</u>	<u>Unit Type</u>	<u>Lead Regulatory Agency</u>	<u>Unit Category</u>
12	200-UP-2 (Continued)	UN-200-W-118	Unplanned Release	EPA	CPP
		UN-200-W-125	Unplanned Release		CPP
		UN-200-W-161	Unplanned Release		CPP
		U Plant Burning Pit	Burial Ground		CPP
	100-BC-2 (GW addressed by 100-BC-5)	116-C-2A	Crib		CPP
		116-C-2B	Pump Station		CPP
		116-C-2C	Sand Filter		CPP
		116-C-3	Storage Tank		CPP
		116-C-6	Pit		CPP
		118-B-1	Burial Ground		CPP
		118-B-2	Burial Ground		CCP
		118-B-3	Burial Ground		CCP
		118-B-4	Burial Ground		CCP
		118-B-6	Burial Ground		CCP
		118-C-1	Burial Ground		CPP
		118-C-2	Storage Tank		CPP
		132-C-1	Stack		CPP
		132-C-3	Building		CPP
		1607-B8	Septic Tank		CPP
		1607-B9	Septic Tank		CPP
		1607-B10	Septic Tank		CPP
		1607-B11	Septic Tank		CPP
13	200-BP-5 (GW O.U.)	200-BP-1	Source O.U.	EPA	CPP
		200-BP-3	Source O.U.		CPP
		200-BP-4	Source O.U.		CPP
		200-BP-6	Source O.U.		CPP
		200-BP-7	Source O.U.		CPP
		200-BP-8	Source O.U.		CPP
		200-BP-9	Source O.U.		CPP
		200-BP-10	Source O.U.		CPP
		200-BP-11	Source O.U.		CPP
		(North Part)			
		200-NO-1	Source O.U.		CPP
		200-PO-2	Source O.U.		CPP
		(North Part)			
		200-PO-3	Source O.U.		CPP
		(North Part)			
		200-PO-5	Source O.U.		CPP
		(North Part)			
		200-SO-1	Source O.U.		CPP
		200-IU-6	Source O.U.		CPP

## APPENDIX C

Prioritized Listing of Operable Units. (sheet 9 of 28)

<u>Priority</u>	<u>Operable Unit</u>	<u>Title of Units</u>	<u>Unit Type</u>	<u>Lead Regulatory Agency</u>	<u>Unit Category</u>
14	100-DR-2 (GW addressed by 100-HR-3)	116-DR-3 116-DR-4 116-DR-6 116-DR-7 116-DR-8 118-D-5 126-DR-1	Trench Crib Trench Crib French Drain Burial Ground Demolition and Inert Landfill	Ecology	RPP RPP RPP RPP RPP RPP RPP
		132-DR-1 1607-D3	Pump Station Septic Tank		RPP RPP
16	100-KR-2 (GW addressed by 100-KR-4)	130-KE-1 130-KW-1 116-KE-1 116-KE-2 116-KE-3 116-KW-1 116-KW-2 118-K-1 120-KE-8 120-KW-6 126-K-1	Storage Tank Storage Tank Crib Crib Reverse Well Crib Reverse Well Burial Ground Brine Pit Brine Pit Demolition and Inert Landfill	EPA	CPP CPP CPP CPP CPP CPP CPP CPP CPP CPP CPP
		1607-K4 1607-K6 130-KE-2 130-KW-2 130-K-1 130-K-2 UN-100-K-1	Septic Tank Septic Tank Storage Tank Storage Tank Storage Tank Storage Tank Unplanned Release		CPP CPP CPP CPP CPP CPP CPP
17	200-BP-4 (Source O.U.)	216-B-11A&B 216-B-51 216-B-7A&B 216-B-8TF	Reverse Well French Drain Crib Crib		
18	200-BP-11 (Source O.U.)	216-B-3 (B Pond) 216-B-3-1 216-B-3-2 216-B-3-3 216-B-3A 216-B-3B 216-B-3C 216-E-25 UN-200-E-14 UN-200-E-92	Pond Ditch Ditch Ditch Pond Pond Pond Pond Unplanned Release Unplanned Release	Ecology	TSD (D-2-5) RPP RPP TSD (D-2-5) TSD (D-2-5) TSD (D-2-5) TSD (D-2-5) RPP RPP RPP

# APPENDIX C

Prioritized Listing of Operable Units. (sheet 10 of 28)

<u>Priority</u>	<u>Operable Unit</u>	<u>Title of Units</u>	<u>Unit Type</u>	<u>Lead Regulatory Agency</u>	<u>Unit Category</u>
19	200-P0-2 (Source O.U.)	216-A-2	Crib	Ecology	RPP
		216-A-3	Crib		
		216-A-4	Crib		
		216-A-5	Crib		RPP
		216-A-9	Crib		
		216-A-10	Crib		
		216-A-11	French Drain		TSD (D-2-2)
		216-A-12	French Drain		RPP
		216-A-13	French Drain		RPP
		216-A-14	French Drain		RPP
		216-A-15	French Drain		RPP
		216-A-21	Crib		RPP
		216-A-22	French Drain		
		216-A-26	French Drain		
		216-A-26A	French Drain		RPP
		216-A-27	Crib		RPP
		216-A-28	French Drain		
		216-A-31	Crib		
		216-A-32	Crib		RPP
		216-A-33	French Drain		RPP
		216-A-35	French Drain		RPP
		216-A-36A	Crib		TSD (D-2-
		216-A-36B	Crib		
		216-A-38-1	Crib		
		216-A-40	Trench		RPP
		216-A-41	Crib		RPP
		216-A-45	Crib		RPP
		218-E-1	Burial Ground		
		218-E-13	Burial Ground		
		241-A-151	Diversion Box		RPP
		241-A-302A	Catch Tank		RPP
		299-E24-111	Injection Well		RPP
		2607-E6	Septic Tank		RPP
		2607-EA	Septic Tank		RPP
		UN-200-E-10	Unplanned Release		RPP
		UN-200-E-11	Unplanned Release		RPP
		UN-200-E-12	Unplanned Release		RPP
		UN-200-E-13	Unplanned Release		RPP
		UN-200-E-15	Unplanned Release		
		UN-200-E-19	Unplanned Release		
		UN-200-E-20	Unplanned Release		RPP
		UN-200-E-22	Unplanned Release		RPP
		UN-200-E-25	Unplanned Release		
		UN-200-E-26	Unplanned Release		
		UN-200-E-28	Unplanned Release		RPP
		UN-200-E-31	Unplanned Release		RPP
		UN-200-E-33	Unplanned Release		RPP
		UN-200-E-35	Unplanned Release		RPP



## APPENDIX C

Prioritized Listing of Operable Units. (sheet 11 of 28)

<u>Priority</u>	<u>Operable Unit</u>	<u>Title of Units</u>	<u>Unit Type</u>	<u>Lead Regulatory Agency</u>	<u>Unit Category</u>
	200-PO-2 (Continued)	UN-200-E-39	Unplanned Release		
		UN-200-E-40	Unplanned Release		
		UN-200-E-42	Unplanned Release		RPP
		UN-200-E-49	Unplanned Release		RPP
		UN-200-E-58	Unplanned Release		RPP
		UN-200-E-60	Unplanned Release		RPP
		UN-200-E-65	Unplanned Release		RPP
		UN-200-E-88	Unplanned Release		RPP
		UN-200-E-96	Unplanned Release		RPP
		UN-200-E-97	Unplanned Release		
		UN-200-E-114	Unplanned Release		RPP
		UN-200-E-117	Unplanned Release		
		UN-200-E-142	Unplanned Release		RPP
20	200-PO-5 (Source O.U.)	207-A	Retention Basin		
		216-A-1	Crib		
		216-A-7	Crib		
		216-A-8	Crib		
		216-A-16	French Drain		
		216-A-17	French Drain		
		216-A-18	Trench		
		216-A-19	Trench		
		216-A-20	Trench		
		216-A-23A	French Drain		
		216-A-23B	French Drain		
		216-A-24	Crib		
		216-A-29	Ditch		
		216-A-34	Ditch		
		216-A-524	Control Structure		
		241-A-302B	Catch Tank		
		2607-EC	Septic Tank		
		UN-200-E-56	Unplanned Release		
		UN-200-E-67	Unplanned Release		TSD (D-2-3)
A	200-UP-1 (GW O.U.)	200-UP-2	Source O.U.		
A	200-ZP-1 (GW O.U.)	200-ZP-2	Source O.U.		CCP
		200-TP-2	Source O.U.		
		200-TP-4	Source O.U.		
B	100-DR-3 (GW addressed by 100-HR-3)	116-DR-10	Pit	Ecology	
		118-D-1	Burial Ground		
		118-D-2	Burial Ground		
		118-D-3	Burial Ground		
		118-D-4	Burial Ground		
		118-DR-1	Burial Ground		
		128-D-1	Burning Pit		
		1607-D1	Septic Tank		

# APPENDIX C

Prioritized Listing of Operable Units. (sheet 12 of 28)

Priority	Operable Unit	Title of Units	Unit Type	Lead Regulatory Agency	Unit Category
B	100-FR-2	118-F-1	Burial Ground	Ecology	RPP
		118-F-2	Burial Ground		
		118-F-3	Burial Ground		
		118-F-4	Burial Ground		
		118-F-5	Burial Ground		
		118-F-6	Burial Ground		
		118-F-7	Burial Ground		
		118-F-9	Burial Ground		
		120-F-1	Trench		
		126-F-1	Ash Pit		
		128-F-1	Burning Pit		
		128-F-3	Burning Pit		
		1607-F1	Septic Tank		
	100-HR-2 (GW addressed by 100-HR-3)	118-H-1	Burial Ground		
		118-H-2	Burial Ground		
		118-H-3	Burial Ground		
		118-H-4	Burial Ground		
		118-H-5	Burial Ground		
		126-H-1	Ash Pit		
		128-H-1	Burning Pit		
		128-H-2	Burning Pit		
		128-H-3	Burning Pit		
		132-H-2	Building		
		1607-H1	Septic Tank		
		1607-H4	Septic Tank		
B	100-KR-3 (GW addressed by 100-KR-4)	120-KE-1	French Drain	EPA	CPP
		120-KW-2	French Drain		
		120-KE-3	Trench		
		120-KE-2	French Drain		
		120-KW-5	Storage Tank		
		120-KE-6	Storage Tank		
		120-KE-9	Brine Pit		
		120-KW-1	French Drain		
		120-KW-7	Brine Pit		
		128-K-1	Burning Pit		
		128-K-2	Burning Pit		
		130-K-3	Storage Tank		
		1607-K1	Septic Tank		
		1607-K2	Septic Tank		
		1607-K3	Septic Tank		
		1607-K5	Septic Tank		
B	100-IU-1	Army Munitions	Burial Ground		
		Burial Site			
		Riverland Railroad			
		Pit			
		Car Wash Pit			

## APPENDIX C

Prioritized Listing of Operable Units. (sheet 13 of 28)

<u>Priority</u>	<u>Operable Unit</u>	<u>Title of Units</u>	<u>Unit Type</u>	<u>Lead Regulatory Agency</u>	<u>Unit Category</u>
B	200-BP-2 (Source O.U.)	216-B-14	Crib	Ecology	
		216-B-15	Crib		
		216-B-16	Crib		
		216-B-17	Crib		
		216-B-18	Crib		
		216-B-19	Crib		
		216-B-20	Trench		
		216-B-21	Trench		
		216-B-22	Trench		
		216-B-23	Trench		
		216-B-24	Trench		
		216-B-25	Trench		
		216-B-26	Trench		
		216-B-27	Trench		
		216-B-28	Trench		
		216-B-29	Trench		
		216-B-30	Trench		
		216-B-31	Trench		
		216-B-32	Trench		
		216-B-33	Trench		
		216-B-34	Trench		
		216-B-52	Trench		
		216-B-53A	Trench		
		216-B-53B	Trench		
		216-B-54	Trench		
		216-B-58	Trench		
		UN-200-E-83	Unplanned Release		
	200-PO-1 (GW O.U.)	200-BP-2	Source O.U.	Ecology	CPP
		200-BP-11	Source O.U.		CPP
		(South Part)			
		200-PO-2	Source O.U.		CPP
		(South Part)			
		200-PO-3	Source O.U.		CPP
		(South Part)			
		200-PO-4	Source O.U.		CPP
	200-PO-5 (South Part)	200-PO-5	Source O.U.	Ecology	CPP
		(South Part)			
		200-SS-1	Source O.U.		CPP
B	200-PO-4 (Source O.U.)	216-A-6	Crib		
		216-A-30	Crib		
		216-A-37-1	Crib		
		216-A-37-2	Crib		
		216-A-42	Retention Basin		
		2607-EL	Septic Tank		

# APPENDIX C

Prioritized Listing of Operable Units. (sheet 14 of 28)

Priority	Operable Unit	Title of Units	Unit Type	Lead Regulatory Agency	Unit Category
B	200-SO-1 (Source O.U.)	200-E Power Ditch	House Ditch		
		216-C-1	Crib		
		216-C-2	Reverse Well		
		216-C-3	Crib		
		216-C-4	Crib		
		216-C-5	Crib		
		216-C-6	Crib		
		216-C-7	Crib		
		216-C-9	Pond		
		216-C-10	Crib		
		218-C-9	Burial Ground		
		241-CX-70	Storage Tank		
		241-CX-71	Neutralization Tank		
		241-CX-72	Storage Tank		
		2607-E5	Septic Tank		
		2607-E7A	Septic Tank		
		Hot Semi-Works	Valve Pit		
		Valve Pit			
		UN-200-E-36	Unplanned Release		
		UN-200-E-37	Unplanned Release		
		UN-200-E-98	Unplanned Release		
		UN-200-E-141	Unplanned Release		
B	200-TP-1	216-T-5	Trench		
		216-T-7TF	Crib		
		216-T-21	Trench		
		216-T-22	Trench		
		216-T-23	Trench		
		216-T-24	Trench		
		216-T-25	Trench		
		216-T-32	Crib		
		216-T-36	Crib		
	200-TP-2	2607-WT	Septic Tank		
		216-T-13	Trench		
		216-T-18	Crib		
		216-T-19TF	Crib		
		216-T-20	Trench		
		216-T-26	Crib		
		216-T-27	Crib		
		216-T-28	Crib		
		216-T-31	French Drain		
		241-TX-152	Diversion Box		
		241-TX-155	Diversion Box		
		241-TX-302B	Catch Tank		
		241-TX-302BR	Catch Tank		
		UN-200-W-14	Unplanned Release		
		UN-200-W-29	Unplanned Release		
		UN-200-W-99	Unplanned Release		
		UN-200-W-113	Unplanned Release		
		UN-200-W-135	Unplanned Release		

## APPENDIX C

Prioritized Listing of Operable Units. (sheet 15 of 28)

<u>Priority</u>	<u>Operable Unit</u>	<u>Title of Units</u>	<u>Unit Type</u>	<u>Lead Regulatory Agency</u>	<u>Unit Category</u>
B	200-TP-4	216-T-1	Ditch		
		216-T-2	Reverse Well		
		216-T-3	Reverse Well		
		216-T-8	Crib		
		216-T-9	Trench		
		216-T-10	Trench		
		216-T-11	Trench		
		216-T-29	Crib		
		216-T-33	Crib		
		216-T-34	Crib		
		216-T-35	Crib		
		218-W-8	Burial Ground		
		241-T-361	Settling Tank		
		241-TX-154	Diversion Box		
		241-TX-302C	Catch Tank		
		2607-W3	Septic Tank		
		2607-W4	Septic Tank		
		UN-200-W-2	Unplanned Release		
		UN-200-W-3	Unplanned Release		
		UN-200-W-4	Unplanned Release		
		UN-200-W-8	Unplanned Release		
		UN-200-W-27	Unplanned Release		
		UN-200-W-38	Unplanned Release		
		UN-200-W-58	Unplanned Release		
		UN-200-W-65	Unplanned Release		
		UN-200-W-67	Unplanned Release		
		UN-200-W-73	Unplanned Release		
		UN-200-W-77	Unplanned Release		
		UN-200-W-85	Unplanned Release		
		UN-200-W-98	Unplanned Release		
		UN-200-W-102	Unplanned Release		
		UN-200-W-137	Unplanned Release		

# APPENDIX C

## Prioritized Listing of Operable Units. (sheet 16 of 28)

Priority	Operable Unit	Title of Units	Unit Type	Lead Regulatory Agency	Unit Category
B	200-ZP-2	207-Z	Retention Basin		CPP
		216-Z-1&2TF	Crib		CPP
		216-Z-1A	Drain Field		CPP
		216-Z-3	Crib		CPP
		216-Z-4	Trench		CPP
		216-Z-5	Crib		CPP
		216-Z-6	Crib		CPP
		216-Z-7	Crib		CPP
		216-Z-8	French Drain		CPP
		216-Z-9	Trench		CPP
		216-Z-10	Reverse Well		CPP
		216-Z-12	Crib		CPP
		216-Z-13	French Drain		CPP
		216-Z-14	French Drain		CPP
		216-Z-15	French Drain		CPP
		216-Z-16	Crib		CPP
		216-Z-17	Trench		CPP
		216-Z-18	Crib		CPP
		231-W-151	Vault		CPP
		241-Z-8	Settling Tank		CPP
		241-Z-361	Settling Tank		CPP
		2607-Z	Septic Tank		CPP
		2607-W8	Septic Tank		CPP
		2607-WA	Septic Tank		CPP
		2607-Z8	Septic Tank		CPP
		UN-200-W-23	Unplanned Release		CCP
		UN-200-W-74	Unplanned Release		CPP
		UN-200-W-75	Unplanned Release		CPP
		UN-200-W-79	Unplanned Release		CPP
		UN-200-W-89	Unplanned Release		CPP
		UN-200-W-90	Unplanned Release		CPP
		UN-200-W-91	Unplanned Release		CPP
		UN-200-W-103	Unplanned Release		CPP
		UN-200-W-130	Unplanned Release		CPP
		UN-200-W-159	Unplanned Release		CPP
B	200-IU-3	Central Landfill	Landfill		
		Original Central Landfill	Landfill		
		NRDW Landfill	Landfill		TSD (D-6-1)
		6607-1	Septic Tank		
		6607-2	Septic Tank		
		UN-600-12	Unplanned Release		

# APPENDIX C

## Prioritized Listing of Operable Units. (sheet 17 of 28)

<u>Priority</u>	<u>Operable Unit</u>	<u>Title of Units</u>	<u>Unit Type</u>	<u>Lead Regulatory Agency</u>	<u>Unit Category</u>
B	300-FF-2 (GW addressed by 300-FF-5)	300 Vitrifaction	Test treatment	EPA	CPP
		Test Site	Facility		
		300 Interim Filter	Neutralization Unit		CPP
		Backwash Disposal			
		303-M Oxide Facility	Treatment Facility		TSD (T-3-2)
		309-TW-1	Storage Tank		CPP
		309-TW-2	Storage Tank		CPP
		309-TW-3	Storage Tank		CPP
		315 Retired Drain	Drain Field		CPP
		Field			
		316-4	Crib		
		331 Drain field	Drain Field		
		331 Trench 1	Trench		CPP
		331 Trench 2	Trench		CPP
		335 & 336 Retired	Drain Fields		CPP
		Drain Fields			
		618-1	Burial Ground		CPP
		618-2	Burial Ground		CCP
		618-3	Burial Ground		CPP
		618-6	Burial Ground		CCP
		618-7	Burial Ground		CPP
		618-8	Burial Ground		CPP
		618-9	Burial Ground		CPP
		618-10	Burial Ground		
		618-11	Burial Ground		
		618-13	Burial Ground		CPP
		UN-300-4	Unplanned Release		CPP
		UN-300-5	Unplanned Release		
		UN-300-7	Unplanned Release		
		UN-300-10	Unplanned Release		CPP
		UN-300-12	Unplanned Release		CPP
		UN-300-13	Unplanned Release		CPP
		UN-300-17	Unplanned Release		CPP
		UN-300-18	Unplanned Release		CPP
		UN-300-39	Unplanned Release		CPP
		UN-300-40	Unplanned Release		CPP
		UN-300-42	Unplanned Release		CPP
		UN-300-43	Unplanned Release		CPP
		UN-300-44	Unplanned Release		CPP
		UN-300-45	Unplanned Release		CPP
		J. A. Jones #1	Landfill		

# APPENDIX C

Prioritized Listing of Operable Units. (sheet 18 of 28)

<u>Priority</u>	<u>Operable Unit</u>	<u>Title of Units</u>	<u>Unit Type</u>	<u>Lead Regulatory Agency</u>	<u>Unit Catego.</u>
	300-FF-2 (Continued)	4713-B French Drain	French Drain		
		4722-B French Drain	French Drain		
		4722-C French Drain	French Drain		
		French Drain #10	French Drain		
		French Drain #10A	French Drain		
		French Drain #1A	French Drain		
		French Drain #1B	French Drain		
		French Drain #2	French Drain		
		French Drain #3	French Drain		
		French Drain #4	French Drain		
		French Drain #5	French Drain		
		French Drain #6	French Drain		
		French Drain #7	French Drain		
		French Drain #8	French Drain		
		French Drain #9	French Drain		
		403 French Drain	French Drain		
		4721 French Drain	French Drain		
		400 Area Process Pond and Sewer	Pond		
		400 Area Retired French Drains	French Drain		
		400 Area Retired Sanitary Pond	Pond		
		400 Area Retired Septic Tanks	Septic Tank		
		Sand Bottom Trench	Trench		
		Sanitary Sewer	Drain Field		
		Sanitary Tile Field	Drain Field		
		4831 Laydown Hazardous Staging	Staging Area		
		UN-400-1	Unplanned Release		
C	100-IU-2	628-1	Burning Pit		
		East White Bluffs Landfill	Landfill		
		White Bluffs Landfill	Landfill		
		J. A. Jones #2	Burial Ground		
C	100-IU-3	USBR 2,4-D Burial Site	Landfill		
		Wahulke Slope NIKE Missile Base	Test Treatment or Support Facility		

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## APPENDIX C

Prioritized Listing of Operable Units. (sheet 19 of 28)

<u>Priority</u>	<u>Operable Unit</u>	<u>Title of Units</u>	<u>Unit Type</u>	<u>Lead Regulatory Agency</u>	<u>Unit Category</u>
C	1100-EM-2	1100 Hoist Rams	Storage Tank		
		1100 HWSA	Staging Area		
		1100 Steam Pad	Storage Tank		
		Tank #2			
		1100 Steam Pad	Storage Tank		
		Tank #3			
		1100 Used Oil Tank #4	Storage Tank		
		1100 Used Oil Tank #5	Storage Tank		
		1100 Used Oil Tank #6	Storage Tank		
		700 Area Waste	Storage Tank		
		Solvent Tank			
C	1100-EM-3	1208 HWSA	Staging Area		
		1226 HWSA	Staging Area		
		1234 Storage Yard	Staging Area		
		1240 HWSA	Staging Area		
		Jones Yard HWSA	Staging Area		
		UnderGround Used Oil	Storage Tank		
		Tank			
		UN-3000-1	Unplanned Release		
C	1100-IU-1	6652-C SSL	Septic Tank		
		Active Septic Tank			
		6652-C SSL	Septic Tank		
		Inactive Septic			
		Tank			
		6652-I ALE	Septic Tank		
		Septic Tank			
		6652-G ALE	Septic Tank		
		Septic Tank			
		Rattlesnake Mtn.	Test Treatment or		
		NIKE Missile Base	Support Facility		
C	200-BP-10	218-E-2	Burial Ground		
		218-E-2A	Burial Ground		
		218-E-4	Burial Ground		
		218-E-5	Burial Ground		
		218-E-5A	Burial Ground		
		218-E-9	Burial Ground		
		UN-200-E-61	Unplanned Release		
		UN-200-E-95	Unplanned Release		
		UN-200-E-112	Unplanned Release		
C	200-BP-3	216-B-35	Trench		
	(Source O.U.)	216-B-36	Trench		
		216-B-37	Trench		
		216-B-38	Trench		
		216-B-39	Trench		
		216-B-40	Trench		
		216-B-41	Trench		
		216-B-42	Trench		

# APPENDIX C

Prioritized Listing of Operable Units. (sheet 20 of 28)

<u>Priority</u>	<u>Operable Unit</u>	<u>Title of Units</u>	<u>Unit Type</u>	<u>Lead Regulatory Agency</u>	<u>Unit Categor.</u>
C	200-BP-6	216-B-4	Reverse Well	EPA	CPP
		216-B-5	Reverse Well		CPP
		216-B-6	Reverse Well		CPP
		216-B-9TF	Crib		CPP
		216-B-10A	Crib		CPP
		216-B-10B	Crib		CPP
		216-B-13	French Drain		CPP
		216-B-56	Crib		CPP
		216-B-59A	Trench		CPP
		216-B-59B	Retention Basin		CPP
		216-B-60	Crib		CPP
		218-E-6	Burial Ground		CPP
		218-E-7	Burial Ground		CPP
		241-B-154	Diversion Box		CPP
		241-B-302-B	Catch Tank		CPP
		241-B-361	Settling Tank		CPP
		241-BX-154	Diversion Box		CPP
		241-BX-155	Diversion Box		CPP
		241-BX-302B	Catch Tank		CPP
		241-BX-302C	Catch Tank		CPP
		241-ER-152	Diversion Box		CPP
		270-E Condensate Neutralization Tank	Neutralization Tank		CPP
		2607-E3	Septic Tank		CPP
		2607-E4	Septic Tank		CPP
		Tile Field South of 218-E-4	Drain Field		CPP
		UN-200-E-1	Unplanned Release		CPP
		UN-200-E-2	Unplanned Release		CPP
		UN-200-E-3	Unplanned Release		CPP
		UN-200-E-7	Unplanned Release		CPP
		UN-200-E-41	Unplanned Release		CPP
		UN-200-E-44	Unplanned Release		CPP
		UN-200-E-45	Unplanned Release		CPP
		UN-200-E-52	Unplanned Release		CPP
		UN-200-E-54	Unplanned Release		CPP
		UN-200-E-55	Unplanned Release		CPP
		UN-200-E-69	Unplanned Release		CPP
		UN-200-E-80	Unplanned Release		CPP
		UN-200-E-85	Unplanned Release		CPP
		UN-200-E-87	Unplanned Release		CPP
		UN-200-E-90	Unplanned Release		CPP
		UN-200-E-103	Unplanned Release		CPP
		UN-200-E-140	Unplanned Release		CPP

## APPENDIX C

Prioritized Listing of Operable Units. (sheet 21 of 28)

<u>Priority</u>	<u>Operable Unit</u>	<u>Title of Units</u>	<u>Unit Type</u>	<u>Lead Regulatory Agency</u>	<u>Unit Category</u>
C	200-BP-8	207-B	Retention Basin		
		216-B-2-1	Ditch		
		216-B-2-2	Ditch		
		216-B-2-3	Ditch		
		216-B-63	Ditch		
		2607-E9	Septic Tank		TSD (D-2-6)
C	200-BP-9	200 Area Construction Pit	Pit		
		216-B-12	Crib		
		216-B-55	Crib		
		216-B-62	Crib		
		216-B-64	Retention Basin		
		241-ER-151	Diversion Box		
		241-ER-311	Catch Tank		
		UN-200-E-64	Unplanned Release		
C	200-NO-1 (Source O.U.)	216-N-1	Pond		
		216-N-2	Trench		
		216-N-3	Trench		
		216-N-4	Pond		
		216-N-5	Trench		
		216-N-6	Pond		
		216-N-7	Trench		
	200-PO-6	200-E Burning Pit	Pit		
		218-E-12A	Burial Ground		
		218-E-8	Burial Ground		
C	200-RO-1	UN-200-E-62	Unplanned Release		
		216-S-4	French Drain		
		216-S-5	Crib		
		216-S-6	Crib		
		216-S-10D	Ditch		TSD (D-2-7)
		216-S-10P	Pond		TSD (D-2-7)
		216-S-11	Pond		
		216-S-16D	Ditch		
		216-S-16P	Pond		
		216-S-17	Pond		
		216-S-172	Control Structure		
		216-S-19	Pond		
		216-S-21	Crib		
		216-S-25	Crib		
		2607-WZ	Septic Tank		
		2904-S-160	Control Structure		
		2904-S-170	Control Structure		
		2904-S-171	Control Structure		

## APPENDIX C

Prioritized Listing of Operable Units. (sheet 22 of 28)

<u>Priority</u>	<u>Operable Unit</u>	<u>Title of Units</u>	<u>Unit Type</u>	<u>Lead Regulatory Agency</u>	<u>Unit Categor.</u>
C	200-RO-2	207-S	Retention Basin		
		216-S-1&2	Crib		
		216-S-3	French Drain		
		216-S-7	Crib		
		216-S-8	Trench		
		216-S-9	Crib		
		216-S-13	Crib		
		216-S-15	Pond		
		216-S-18	Trench		
		216-S-23	Crib		
		218-W-9	Burial Ground		
		241-S-151	Diversion Box		
		241-S-302A	Catch Tank		
		241-SX-302	Catch Tank		
		UN-200-W-32	Unplanned Release		
		UN-200-W-34	Unplanned Release		
		UN-200-W-41	Unplanned Release		
		UN-200-W-42	Unplanned Release		
		UN-200-W-49	Unplanned Release		
		UN-200-W-50	Unplanned Release		
		UN-200-W-52	Unplanned Release		
		UN-200-W-69	Unplanned Release		
		UN-200-W-82	Unplanned Release		
		UN-200-W-83	Unplanned Release		
		UN-200-W-108	Unplanned Release		
		UN-200-W-109	Unplanned Release		
		UN-200-W-114	Unplanned Release		
		UN-200-W-123	Unplanned Release		
		UN-200-W-127	Unplanned Release		
C	200-RO-3	207-SL	Retention Basin		
		216-S-12	Trench		
		216-S-14	Trench		
		216-S-20	Crib		
		216-S-22	Crib		
		216-S-26	Crib		
		218-W-7	Burial Ground		
		240-S-151	Diversion Box		
		240-S-152	Diversion Box		
		240-S-302	Catch Tank		
		2607-W6	Septic Tank		
		UN-200-W-30	Unplanned Release		
		UN-200-W-35	Unplanned Release		
		UN-200-W-43	Unplanned Release		
		UN-200-W-56	Unplanned Release		
		UN-200-W-61	Unplanned Release		
		UN-200-W-116	Unplanned Release		

## APPENDIX C

Prioritized Listing of Operable Units. (sheet 23 of 28)

<u>Priority</u>	<u>Operable Unit</u>	<u>Title of Units</u>	<u>Unit Type</u>	<u>Lead Regulatory Agency</u>	<u>Unit Category</u>
C	200-TP-3	207-T	Retention Basin		
		216-T-12	Trench		
		216-T-14	Trench		
		216-T-15	Trench		
		216-T-16	Trench		
		216-T-17	Trench		
		216-T-4-1D	Ditch		
		216-T-4-2	Ditch		
		216-T-4A	Pond		
		216-T-4B	Pond		
		216-T-6	Crib		
		UN-200-W-7	Unplanned Release		
		UN-200-W-63	Unplanned Release		
C	200-ZP-3	218-W-1	Burial Ground		
		218-W-1A	Burial Ground		
		218-W-2	Burial Ground		
		218-W-2A	Burial Ground		
		218-W-3	Burial Ground		
		218-W-4A	Burial Ground		
		218-W-11	Burial Ground		
		2607-WWA	Septic Tank		
		Z Plant Burning Pit	Pit		
		UN-200-W-11	Unplanned Release		
		UN-200-W-44	Unplanned Release		
C	200-IU-4	UN-200-W-132	Unplanned Release		
		Hanford Townsite	Landfill		
		Landfill			
		Hanford Trailer Camp	Landfill		
		Landfill			
		213 J & K	Crib		
		P-11	Crib		
		UN-600-16	Unplanned Release		
D	100-IU-4	UN-600-18	Unplanned Release		
		UN-600-19	Spill		
		Sodium Dichromate	Landfill		
D	100-IU-5	Barrel Disposal			
		White Bluffs Pickling Acid	Crib		

# APPENDIX C

Prioritized Listing of Operable Units. (sheet 24 of 28)

<u>Priority</u>	<u>Operable Unit</u>	<u>Title of Units</u>	<u>Unit Type</u>	<u>Lead Regulatory Agency</u>	<u>Unit Categor.</u>
D	200-SS-1	200-E Powerhouse Ash Pit 218-E-3 2607-E1 2607-E7B 2607-E8 2607-EH 2607-EK 2607-EM 2607-EP 2607-EQ 2607-ER 2607-GF Chemical Tile Field North of 2703-E	Ash Pit Burial Ground Septic Tank Septic Tank Septic Tank Septic Tank Septic Tank Septic Tank Septic Tank Septic Tank Septic Tank Septic Tank Septic Tank Drain field		
	200-SS-2	200 West Ash Disposal Basin 200 West Burning Pit 200-W Powerhouse Ash Pit 216-W-LC 2607-W1 2607-W2 UN-200-W-88	Ash Pit Burning Pit Ash Pit Crib Septic Tank Septic Tank Unplanned Release		
D	200-IU-1	Exploratory Shaft HWSA Exploratory Shaft Septic Tank 6607-3	Staging Area Septic Tank Septic Tank		
D	200-IU-6 (Source O.U.)	216-A-25 216-N-8	Pond Pond		
D	200-IU-2	NSTF Septic Tank NSTF UnderGround Tank 628-2 1607-FSM	Septic Tank Storage Tank Burning Pit Septic Tank		
D	200-IU-5	Batch Plant HWSA 2607-FSN 622-1 622-R Old Central Shop Area	Staging Area Septic Tank Dumping Area Septic Tank Test Treatment or Support Facility		

## APPENDIX C

Prioritized Listing of Operable Units. (sheet 25 of 28)

<u>Priority</u>	<u>Operable Unit</u>	<u>Title of Units</u>	<u>Unit Type</u>	<u>Lead Regulatory Agency</u>	<u>Unit Category</u>
*	200-BP-7	241-B Tank Farm (16 Units)	Single-Shell Tank	Ecology	TSD (S-2-4)
		241-B-151	Diversion Box		RPP
		241-B-152	Diversion Box		RPP
		241-B-153	Diversion Box		RPP
		241-B-252	Diversion Box		RPP
		241-B-301B	Catch Tank		RPP
		241-BR-152	Diversion Box		RPP
		241-BX Tank Farm (12 Units)	Single-Shell Tank		TSD (S-2-4)
		241-BX-153	Diversion Box		RPP
		241-BX-302A	Catch Tank		RPP
		241-BXR-151	Diversion Box		RPP
		241-BXR-152	Diversion Box		RPP
		241-BXR-153	Diversion Box		RPP
		241-BY Tank Farm (12 Units)	Single-Shell Tank		TSD (S-2-4)
		241-BYR-152	Diversion Box		RPP
		241-BYR-153	Diversion Box		RPP
		241-BYR-154	Diversion Box		RPP
		242-B-151	Diversion Box		RPP
		244-BXR	Receiving Vault		RPP
		2607-EB	Septic Tank		RPP
		UN-200-E-43	Unplanned Release		RPP
		UN-200-E-76	Unplanned Release		RPP
		UN-200-E-79	Unplanned Release		RPP
		UN-200-E-101	Unplanned Release		RPP
		UN-200-E-105	Unplanned Release		RPP
		UN-200-E-109	Unplanned Release		RPP
*	200-PO-3	216-A-39	Crib	Ecology	RPP
		216-C-8	French Drain		RPP
		241-A Tank Farm (6 Units)	Single-Shell Tank		TSD (S-2-4)
		241-A-152	Diversion Box		RPP
		241-A-153	Diversion Box		RPP
		241-A-350	Catch Tank		RPP
		241-A-417	Catch Tank		RPP
		241-A-A	Diversion Box		RPP
		241-A-B	Diversion Box		RPP
		241-AR-151	Diversion Box		RPP
		241-AX Tank Farm (4 Units)	Single-Shell Tank		TSD (S-2-4)
		241-AX-151	Diversion Box		RPP
		241-AX-152-CT	Catch Tank		RPP
		241-AX-152-DS	Diversion Box		RPP
		241-AX-155	Diversion Box		RPP
		241-AX-501	Valve Pit		RPP
		241-AX-A	Diversion Box		RPP
		241-AX-B	Diversion Box		RPP

# APPENDIX C

Prioritized Listing of Operable Units. (sheet 26 of 28)

Priority	Operable Unit	Title of Units	Unit Type	Lead Regulatory Agency	Unit Category
*	200-PO-3 (Continued)	241-C Tank Farm (16 Units)	Single-Shell Tank	Ecology	TSD (S-2-4)
		241-C-151	Diversion Box		RPP
		241-C-152	Diversion Box		RPP
		241-C-153	Diversion Box		RPP
		241-C-252	Diversion Box		RPP
		241-C-301C	Catch Tank		RPP
		241-CR-151	Diversion Box		RPP
		241-CR-152	Diversion Box		RPP
		241-CR-153	Diversion Box		RPP
		241-ER-153	Diversion Box		RPP
		2607-ED	Septic Tank		RPP
		2607-EG	Septic Tank		RPP
		2607-EJ	Septic Tank		RPP
		UN-200-E-16	Unplanned Release		RPP
		UN-200-E-18	Unplanned Release		RPP
		UN-200-E-27	Unplanned Release		RPP
		UN-200-E-47	Unplanned Release		RPP
		UN-200-E-48	Unplanned Release		RPP
		UN-200-E-68	Unplanned Release		RPP
		UN-200-E-72	Unplanned Release		RPP
		UN-200-E-81	Unplanned Release		RPP
		UN-200-E-82	Unplanned Release		RPP
		UN-200-E-86	Unplanned Release		RPP
		UN-200-E-91	Unplanned Release		RPP
		UN-200-E-94	Unplanned Release		RPP
		UN-200-E-99	Unplanned Release		RPP
		UN-200-E-100	Unplanned Release		RPP
		UN-200-E-107	Unplanned Release		RPP
		UN-200-E-118	Unplanned Release		RPP
*	200-RO-4	241-S Tank Farm (12 Units)	Single-Shell Tank	Ecology	TSD (S-2-4)
		241-S-152	Diversion Box		RPP
		241-S-302B	Catch Tank		RPP
		241-S-A	Valve Pit		RPP
		241-S-B	Valve Pit		RPP
		241-S-C	Valve Pit		RPP
		241-S-D	Valve Pit		RPP
		241-SX Tank Farm (15 Units)	Single-Shell Tank		TSD (S-2-4)
		241-SX-151	Diversion Box		RPP
		241-SX-152	Diversion Box		RPP
		UN-200-W-10	Unplanned Release		RPP
		UN-200-W-80	Unplanned Release		RPP
		UN-200-W-81	Unplanned Release		RPP



## APPENDIX C

Prioritized Listing of Operable Units. (sheet 27 of 28)

<u>Priority</u>	<u>Operable Unit</u>	<u>Title of Units</u>	<u>Unit Type</u>	<u>Lead Regulatory Agency</u>	<u>Unit Category</u>
*	200-TP-5	241-TX Tank Farm (18 Units)	Single-Shell Tank	Ecology	TSD (S-2-4)
		241-TX-153	Diversion Box		RPP
		241-TX-302A	Catch Tank		RPP
		241-TX-302-XB	Catch Tank		RPP
		241-TXR	Vault		RPP
		241-TXR-152	Diversion Box		RPP
		241-TXR-153	Diversion Box		RPP
		241-TY Tank Farm (6 Units)	Single-Shell Tank		TSD (S-2-4)
		241-TY-153	Diversion Box		RPP
		241-TY-302A	Catch Tank		RPP
		241-TY-302B	Catch Tank		RPP
		242-T-151	Diversion Box		RPP
		244-TXR	Vault		RPP
		2607-WT	Septic Tank		RPP
		2607-WTX	Septic Tank		RPP
		UN-200-W-17	Unplanned Release		RPP
		UN-200-W-76	Unplanned Release		RPP
		UN-200-W-100	Unplanned Release		RPP
	200-TP-6	241-T Tank Farm (16 Units)	Single-Shell Tank	Ecology	TSD (S-2-4)
		241-T-151	Diversion Box		RPP
		241-T-152	Diversion Box		RPP
		241-T-153	Diversion Box		RPP
		241-T-252	Diversion Box		RPP
		241-T-301	Catch Tank		RPP
		241-T-302	Catch Tank		RPP
		241-TR-152	Diversion Box		RPP
		241-TR-153	Diversion Box		RPP
		UN-200-W-62	Unplanned Release		RPP
		UN-200-W-64	Unplanned Release		RPP
		UN-200-W-97	Unplanned Release		RPP

# APPENDIX C

## Prioritized Listing of Operable Units. (sheet 28 of 28)

<u>Priority</u>	<u>Operable Unit</u>	<u>Title of Units</u>	<u>Unit Type</u>	<u>Lead Regulatory Agency</u>	<u>Unit Catego</u>
*	200-UP-3	241-U Tank Farm (16 Units)	Single-Shell Tank	Ecology	TSD (S-2-4)
		241-U-151	Diversion Box		
		241-U-152	Diversion Box		
		241-U-153	Diversion Box		RPP
		241-U-252	Diversion Box		RPP
		241-U-301	Catch Tank		RPP
		241-U-A	Diversion Box		RPP
		241-U-B	Diversion Box		RPP
		241-U-C	Diversion Box		RPP
		241-U-D	Diversion Box		RPP
		241-UR-151	Diversion Box		RPP
		241-UR-152	Diversion Box		RPP
		241-UR-153	Diversion Box		RPP
		241-UR-154	Diversion Box		RPP
		244-UR	Receiving Vault		RPP
		2607-WUT	Septic Tank		RPP
		UN-200-W-6	Unplanned Release		
		UN-200-W-71	Unplanned Release		RPP

\*This operable unit contains single-shell tanks and is not prioritized with other operable units. Schedules for RFI/CMS work plans and subsequent characterization are being developed as part of the SST system closure/corrective action work plan.

ALE = Arid Lands Ecology Reserve  
 CPP = CERCLA Past-Practice  
 Ecology = Washington State Department of Ecology  
 EPA = U.S. Environmental Protection Agency  
 GW = Groundwater  
 HWSA = Hazardous Waste Staging Area  
 NRDW = Nonradioactive Dangerous Waste  
 NSTF =  
 O.U. = Operable Unit  
 RLWS = Radioactive Liquid Waste Sewer  
 RPP = RCRA Past-Practice  
 SSL = Space Science Laboratory  
 TSD = Treatment, Storage, and Disposal  
 USBR =

**APPENDIX D**  
**WORK SCHEDULE**

- Listing of Currently Identified Interim and Major Milestones
- Time-Scaled Logic Networks

**NOTE:**

Major Milestones are indicated by a -00 suffix (example, M-21-00). Interim Milestones are indicated by a suffix greater than zero (example, M-22-02). A target date is indicated by a "T" (example, M-21-02-T01). See Section 2.0 of this Action Plan for more details.

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Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-01-00	COMPLETE 14 GROUT CAMPAIGNS OF DOUBLE-SHELL TANK WASTE BY DECEMBER 1996 AND MAINTAIN CURRENCY WITH FEED THEREAFTER.	12/31/1996 (Deleted)
M-01-01	COMPLETE A TOTAL OF 3 GROUT CAMPAIGNS OF DOUBLE-SHELL TANK WASTES (INCLUDING ONE CAMPAIGN OF PHOSPHATE-SULFATE WASTE).	9/30/1991 (Deleted)
M-01-01--T1	CONSTRUCT VAULT 102	3/31/1991 (Deleted)
M-01-01--T2	CONSTRUCT VAULT 103	6/30/1991 (Deleted)
M-01-01--T3	CONSTRUCT VAULT 104 & 105	9/30/1991 (Deleted)
M-01-01A	COMPLETE AND VERIFY 2 CAMPAIGNS OF DOUBLE-SHELL TANK WASTE (THIS INCLUDES ONE CAMPAIGN OF PHOSPHATE-SULFATE WASTE).	9/30/2018 (Deleted)
M-01-01B	COMPLETE 1 ADDITIONAL CAMPAIGN OF DOUBLE-SHELL TANK WASTE (THIS MAKES A TOTAL OF 3 CAMPAIGNS INCLUDING 1 PHOSPHATE-SULFATE WASTE CAMPAIGN).	9/30/2018 (Deleted)
M-01-02	COMPLETE 3 GROUT CAMPAIGNS OF DOUBLE-SHELL TANK WASTE IN C.Y. 1994.	12/31/1994 (Deleted)
M-01-02--T1	DESIGN VAULTS 106-109	2/28/1991 (Deleted)
M-01-02A	INITIATE CONSTRUCTION OF VAULTS 106-109.	11/30/1992 (Completed)
M-01-03	COMPLETE 4 GROUT CAMPAIGNS OF DOUBLE-SHELL TANK WASTE IN C.Y. 1995.	12/31/1995 (Deleted)
M-01-03A	INITIATE CONSTRUCTION OF VAULTS 110-113.	9/30/2018 (Deleted)
M-01-04	COMPLETE 4 GROUT CAMPAIGNS OF DOUBLE-SHELL TANK WASTE IN C.Y. 1996.	12/31/1996 (Deleted)
M-01-04A	INITIATE CONSTRUCTION OF VAULT 114.	11/30/1994 (Deleted)
M-01-05A	COMMITMENTS FOR ADDITIONAL GROUT CAMPAIGNS.	9/30/1994 (Deleted)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-01-05B	COMMITMENTS FOR ADDITIONAL GROUT CAMPAIGNS.	9/30/1996 (Deleted)
M-01-05C	COMMITMENTS FOR ADDITIONAL GROUT CAMPAIGNS.	9/30/1998 (Deleted)
M-01-05D	COMMITMENTS FOR ADDITIONAL GROUT CAMPAIGNS.	9/30/2000 (Deleted)
M-01-05E	COMMITMENTS FOR ADDITIONAL GROUT CAMPAIGNS.	9/30/2002 (Deleted)
M-02-00	INITIATE PRETREATMENT OF DOUBLE-SHELL TANK WASTE. DOUBLE-SHELL TANK WASTE PRETREATMENT IS REQUIRED PRIOR TO DISPOSAL OF HIGH-ACTIVITY TANK WASTES. PRETREATMENT SUPPORTS THE REMOVAL, TREATMENT, AND FINAL DISPOSAL OF WASTES SUBJECT TO LAND DISPOSAL RESTRICTIONS WHICH ARE STORED IN DOUBLE-SHELL TANKS. REMOVAL OF THE WASTES FROM DOUBLE-SHELL TANKS AND DISPOSAL IN GROUT OR GLASS WILL ALLOW DOUBLE-SHELL TANK SPACE TO BE MADE AVAILABLE FOR SINGLE-SHELL TANK WASTE.	9/30/2018 (Deleted)
M-02-00-T01	ISSUE LETTER TO ECOLOGY REQUESTING CONCURRENCE WITH USE OF B PLANT/WESF AS AN R&D FACILITY AND DETERMINATION OF STATE REGULATORY PERMIT REQUIREMENTS	2/29/1992 (Completed)
M-02-00-T02	COMPLETE ENGINEERING STUDY FOR TANK SAFETY TREATMENT MODULE	12/31/1992 (Completed)
M-02-00-T03	PUBLISH SUMMARY OF NCRW TRUEX LABORATORY DEVELOPMENT WORK	12/31/1992 (Completed)
M-02-00-T04	COMPLETE ENGINEERING STUDY ON Cs ION EXCHANGE CAPABILITY	3/31/1993 (Completed)
M-02-00-T05	COMPLETE WASTE TREATMENT FEED OPTIMIZATION (BLENDING) STUDY	3/31/1993 (Completed)
M-02-00-T06	ISSUE TECHNOLOGY PLAN FOR SELECTION OF ADVANCED (ACTINIDE) SEPARATION PROCESS	3/31/1993 (Completed)
M-02-00-T07	INITIATE SETTLING TESTS FOR NCAW IN-TANK SOLIDS WASHING	12/31/1993 (Completed)
M-02-00-T08	COMPLETE SELECTED PRETREATMENT FACILITY(S) CONCEPTUAL DESIGN REPORT(S)	12/31/2018 (Deleted)
M-02-00-T09	START DESIGN OF SELECTED PRETREATMENT FACILITY(S)	12/31/2018 (Deleted)
M-02-00-T10	START CONSTRUCTION OF SELECTED PRETREATMENT FACILITY(S)	12/31/2018 (Deleted)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-02-00-T11	COMPLETE CONSTRUCTION OF SELECTED PRETREATMENT FACILITY(S)	12/31/2018 (Deleted)
M-02-00-T12	INITIATE PRETREATMENT OF DST WASTE IN SELECTED PRETREATMENT FACILITY(S)	12/31/2018 (Deleted)
M-02-01	SUBMIT TO EPA AND ECOLOGY THE DOUBLE-SHELL TANK WASTE DISPOSAL PROGRAM REDEFINITION STUDY.	12/31/1991 (Completed)
M-02-02	INCORPORATE ADDITIONAL INTERIM M/S TO SUPPORT PRETREATMENT OF DST WASTE.	1/31/1992 (Completed)
M-02-02A	COMMITMENTS FOR B PLANT PRETREATMENT OF ADDITIONAL TANK WASTES WILL BE INCORPORATED AS INTERIM MILESTONES.	12/31/1992 (Deleted)
M-02-02A-T1	COMPLETE CONCEPTUAL DESIGN REPORT FOR B PLANT SAFETY CLASS UPGRADES (PROJECT W059) (B PLANT PRETREATMENT) (COMPLETE 2-23-90)	2/28/1990 (Completed)
M-02-02A-T2	COMPLETE NEUTRALIZED CURRENT ACID WASTE FLOWSHEET DEVELOPMENT (B PLANT PRETREATMENT) (COMPLETE 9-28-90)	9/30/1990 (Completed)
M-02-02B	COMMITMENTS FOR B PLANT PRETREATMENT OF ADDITIONAL TANK WASTES WILL BE INCORPORATED AS INTERIM MILESTONES.	12/31/1994 (Deleted)
M-02-02C	COMMITMENTS FOR B PLANT PRETREATMENT OF ADDITIONAL TANK WASTES WILL BE INCORPORATED AS INTERIM MILESTONES.	12/31/1996 (Deleted)
M-02-02D	COMMITMENT FOR B PLANT PRETREATMENT OF ADDITIONAL TANK WASTES WILL BE INCORPORATED AS INTERIM MILESTONES.	12/31/1998 (Deleted)
M-02-02E	COMMITMENTS FOR B PLANT PRETREATMENT OF ADDITIONAL TANK WASTES WILL BE INCORPORATED AS INTERIM MILESTONES.	12/31/2002 (Deleted)
M-02-03	SUBMIT TANK WASTE REMEDIATION SYSTEM BASELINE SCOPE, COST AND SCHEDULE. AS A RESULT OF A RECENT AGREEMENT BETWEEN L. DUFFY, DOE-HQ, C. GREGOIRE, ECOLOGY, AND J. WAGONER, RL, AN INTEGRATED PROGRAM WILL BE DEVELOPED TO ADDRESS TANK SAFETY, GROUT, HWVP AND PRETREATMENT.	3/31/1994 (Deleted)
M-02-03-T1	DEFINE SCOPE AND SCHEDULE FOR TANK FARM INFRASTRUCTURE UPGRADES NEEDED TO SUPPORT TANK WASTE REMEDIATION SYSTEM (TWRS). NEAR-TERM (THROUGH YEAR 2000) UPGRADES WILL BE DEFINED.	1/31/1993 (Completed)
M-02-04	START DST NCAW RETRIEVAL SYSTEM PROCESS TEST. THE DST NCAW RETRIEVAL PROCESS TEST SUPPORTS PROVIDING THE INITIAL FEED FOR HWVP HOT OPERATIONS IN DECEMBER 1999.	12/31/1996 (Deleted)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-02-05	INCORPORATE ADDITIONAL INTERIM MILESTONES TO SUPPORT PRETREATMENT OF DOUBLE-SHELL TANK WASTE. THE INTEGRATED PROGRAM DEVELOPMENT WHICH WILL TAKE PLACE DURING THE NEXT 15 MONTHS WILL LAY THE FOUNDATION FOR DETERMINING FUTURE ACTIVITIES IN THE PRETREATMENT ARENA, INCLUDING THE TYPES OF PRETREATMENT FACILITIES REQUIRED WHEN THEY WILL BE REQUIRED, CONCEPTUAL DESIGN REPORTS TO SUPPORT TIMELY CONSTRUCTION OF THESE FACILITIES, AND THE TECHNICAL PATH REQUIRED TO SUPPORT A FINAL DECISION ON THE ADVANCED PRETREATMENT OF HANFORD WASTES. ONCE AN INTEGRATED PROGRAM IS DEVELOPED BY RL, FIVE MONTHS WILL BE REQUIRED TO PERFORM PEER REVIEWS AND OBTAIN HQ APPROVAL. ESTABLISHING DATES PRIOR TO THE COMPLETION OF THE PROGRAM DEVELOPMENT ACTIVITY WOULD PREEMPT THOROUGH CONSIDERATION OF ALL OPTIONS AVAILABLE.	1/31/1994 (Deleted)
M-03-00	INITIATE HANFORD WASTE VITRIFICATION PLANT OPERATIONS. WASTE WHICH IS PRETREATED IN B PLANT WILL BE DESIGNATED FOR DISPOSAL IN EITHER GLASS OR GROUT, PENDING TREATMENT AND FINAL DISPOSAL, THE WASTES MUST BE STORED IN DOUBLE-SHELL TANKS. COMPLETION OF THE VITRIFICATION PLANT WILL ENABLE THE PRETREATED WASTE TO BE REMOVED FROM DOUBLE-SHELL TANKS, THUS ALLOWING DOUBLE-SHELL TANK SPACE TO BE MADE AVAILABLE FOR SINGLE SHELL TANK WASTE. THE HWVP ALSO SUPPORTS THE REMOVAL, TREATMENT, AND FINAL DISPOSAL OF WASTES SUBJECT TO LAND DISPOSAL RESTRICTIONS WHICH ARE STORED IN DOUBLE-SHELL TANKS. INITIATION OF OPERATIONS IS DEFINED TO BE HOT STARTUP.	12/31/1999 (Deleted)
M-03-01	INITIATE HWVP CONSTRUCTION. "INITIATION OF HWVP CONSTRUCTION IS DEFINED AS START OF HWVP SITE PREPARATION (INCLUDES SITE GRADING, ROADS, GENERIC SITE UTILITIES SUCH AS SEWER, DOMESTIC WATER, CONSTRUCTION POWERS, SECURITY FENCING AND CONSTRUCTION SUPPORT BUILDINGS, INITIATION OF PROCUREMENT FOR LONG-LEAD HWVP CONSTRUCTION MATERIALS AND BY DECEMBER 1991, INITIATE DESIGN OF HWVP CANISTER STORAGE BUILDING)".	4/30/1992 (Completed)
M-03-01--T1	DETAILED VITRIFICATION PLANT DESIGN/CONSTRUCTION SCHEDULE AVAILABLE (DRAFT) (COMPLETE 1-31-90)	3/31/1990 (Completed)
M-03-01--T2	ISSUE PRELIMINARY DESIGN TECHNICAL DESCRIPTIONS REPORT - HWVP	11/30/1990 (Completed)
M-03-01-T01	ESTABLISH DATE FOR HWVP DESIGN COMPLETION	1/31/1992 (Completed)
M-03-01-T02	INITIATE DESIGN OF HWVP CANISTER STORAGE BUILDING	12/31/1991 (Completed)
M-03-02	COMPLETE HWVP CONSTRUCTION.	6/30/1998 (Deleted)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-03-03	COMPLETE VITRIFICATION BUILDING AND HWVP DETAILED DESIGN.	12/31/1994 (Deleted)
M-03-04	INITIATE CONSTRUCTION OF THE CANISTER STORAGE BUILDING OR MULTI-PURPOSE STORAGE BUILDING.	2/28/1993 (Completed)
M-03-05	INITIATE CONSTRUCTION OF THE VITRIFICATION BUILDING FOUNDATION.	1/31/1994 (Deleted)
M-03-06	INITIATE INSTALLATION OF VITRIFICATION BUILDING MECHANICAL EQUIPMENT AND PIPING.	8/31/1994 (Deleted)
M-03-06-T1	INITIATE PROCUREMENT OF THE MELTER	1/31/1994 (Deleted)
M-03-07	INITIATE INSTALLATION OF VITRIFICATION BUILDING ELECTRICAL AND INSTRUMENTATION SYSTEM.	11/30/1994 (Deleted)
M-04-00	PROVIDE ANNUAL REPORTS OF TANK WASTE TREATABILITY STUDIES. WASTES STORED IN DOUBLE-SHELL AND SINGLE-SHELL TANKS, AS WELL AS NEWLY GENERATED WASTES DESTINED TO BE STORED IN THE DOUBLE-SHELL TANKS, WILL BE STUDIED TO DETERMINE THE MOST APPROPRIATE TREATMENT/DISPOSAL METHOD. STUDIES TO DETERMINE THE LONG-TERM FEASIBILITY OF GROUT OR GLASS FOR DISPOSAL OF THESE WASTES ARE INCLUDED IN THE SCOPE OF THIS MILESTONE.	9/30/2018 (Deleted)
M-04-00A	PROVIDE ANNUAL REPORT OF TANK WASTE TREATABILITY STUDIES - 1990 ISSUE. (COMPLETE 9-28-90).	9/30/1990 (Completed)
M-04-00B	PROVIDE ANNUAL REPORT OF TANK WASTE TREATABILITY STUDIES - 1991 ISSUE.	9/30/1991 (Completed)
M-04-00C	PROVIDE ANNUAL REPORT OF TANK WASTE TREATABILITY STUDIES - 1992 ISSUE.	9/30/1992 (Completed)
M-04-00D	PROVIDE ANNUAL REPORT OF TANK WASTE TREATABILITY STUDIES - 1993 ISSUE.	9/30/1993 (Completed)
M-04-00E	PROVIDE ANNUAL REPORT OF TANK WASTE TREATABILITY STUDIES - 1994 ISSUE.	9/30/1994 (Deleted)
M-04-00F	PROVIDE ANNUAL REPORT OF TANK WASTE TREATABILITY STUDIES - 1995 ISSUE.	9/30/1995 (Deleted)
M-04-00G	PROVIDE ANNUAL REPORT OF TANK WASTE TREATABILITY STUDIES - 1996 ISSUE.	9/30/1996 (Deleted)
M-04-00H	PROVIDE ANNUAL REPORT OF TANK WASTE TREATABILITY STUDIES - 1997 ISSUE.	9/30/1997 (Deleted)
M-04-00I	PROVIDE ANNUAL REPORT OF TANK WASTE TREATABILITY STUDIES - 1998 ISSUE.	9/30/1998 (Deleted)



Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-04-00J	PROVIDE ANNUAL REPORT OF TANK WASTE TREATABILITY STUDIES - 1999 ISSUE.	9/30/1999 (Deleted)
M-04-01	PROVIDE LETTER TO ECOLOGY DESCRIBING WORK SCOPE TO BE INCLUDED IN SEPTEMBER 1990 REPORT. (COMPLETE 12-29-89)	12/31/1989 (Completed)
M-05-00	COMPLETE SINGLE-SHELL TANK INTERIM STABILIZATION. COMPLETE THE SINGLE-SHELL TANK INTERIM STABILIZATION ACTIVITIES (REMOVAL OF PUMPABLE LIQUID FROM THOSE 51 SINGLE-SHELL TANKS NOT YET STABILIZED) FOR ALL SINGLE-SHELL TANKS EXCEPT 241-C-105 AND 241-C-106. ALL 149 TANKS, INCLUDING 241-C-105 AND 241-C-106 WILL BE INTERIM STABILIZED AND INTERIM ISOLATED BY SEPTEMBER 1996.	9/30/1995 (Deleted)
M-05-01	INTERIM STABILIZE THREE SINGLE SHELL TANKS.	9/30/1989 (Completed)
M-05-02	INTERIM STABILIZE AN ADDITIONAL 4 SINGLE-SHELL TANKS.	9/30/1990 (Completed)
M-05-03	INTERIM STABILIZE AN ADDITIONAL 4 SINGLE SHELL TANKS.	9/30/1991
M-05-03-T01	START PUMPING OF TANKS OF 241-BY TANK FARM	5/31/1991 (Completed)
M-05-03-T02	START PUMPING 241-C TANK FARM TANKS	8/31/1991 (Completed)
M-05-04	INTERIM STABILIZE AN ADDITIONAL 9 SINGLE-SHELL TANKS.	9/30/1992 (Deleted)
M-05-04-T01	START PUMPING 241-S TANK FARM TANKS	9/30/1991 (Deleted)
M-05-05	INTERIM STABILIZE AN ADDITIONAL 11 SINGLE-SHELL TANKS.	1/31/1994 (Deleted)
M-05-05-T01	START PUMPING OF 241-SX TANK FARM TANKS	7/31/1992 (Deleted)
M-05-05-T02	START PUMPING REMAINDER OF 241-S TANK FARM TANKS	7/31/1992 (Deleted)
M-05-06	INTERIM STABILIZE AN ADDITIONAL 8 SINGLE-SHELL TANKS.	9/30/1994 (Deleted)
M-05-07	INTERIM STABILIZE AN ADDITIONAL 10 SINGLE-SHELL TANKS (STABILIZATION COMPLETE EXCEPT FOR 241-C-105 AND 241-C-106).	9/30/1995 (Deleted)
M-05-08	INTERIM STABILIZE TANKS 241-C-105 AND 241-C-106.	9/30/1996 (Deleted)

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Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-05-09	COMPLETE INTERIM STABILIZATION AND INTERIM ISOLATION OF ALL 149 SINGLE-SHELL TANKS.	9/30/1996 (Deleted)
M-05-10	PROVIDE A WRITTEN BASIS FOR CURRENT WATER ADDITIONS AND STATUS ON MEASURES TO MINIMIZE WATER ADDITIONS FOR TANKS 241-C-105 AND C-106 TO EPA AND ECOLOGY.	9/30/1992 (Completed)
M-05-11	PROVIDE A REVISED CONTINGENCY PLAN FOR LEAKS FROM 241-C-106 TO EPA AND ECOLOGY. THE CONTINGENCY PLAN WILL BE REVISED TO STIPULATE THAT AS SOON AS PRACTICABLE AFTER DISCOVERY OF A LEAK FROM THIS TANK, SUFFICIENT SUPERNATANT AND SLUDGE WILL BE REMOVED TO ELIMINATE THE NEED FOR FURTHER WATER ADDITIONS.	1/31/1993 (Completed)
M-05-12	PROVIDE TO ECOLOGY AND EPA A PLAN WHICH EVALUATES ACTIONS, SCHEDULES, AND COST IMPACTS FOR REMOVING TANK CONTENTS FROM 241-C-106.	9/30/1992 (Completed)
M-05-13	UPGRADE LEAK DETECTION AND SITE CHARACTERIZATION AT TANKS 241-C-105 AND 241-C-106.	4/30/1993 (Completed)
M-05-13-T01	INITIATE MONTHLY PSYCHROMETRIC MEASUREMENTS AT 241-C-105 AND 241-C-106, COMMENCING FISCAL YEAR 1993, TO BE TAKEN WHILE EXHAUSTERS ARE OPERATING.	1/31/1993 (Completed)
M-05-13-T02	COMPLETE PHYSICAL LOGGING OF 14 DRY WELLS AT 241-C-105 AND 241-C-106 USING A SPECTRAL GAMMA PROBE.	4/30/1993 (Completed)
M-05-13-T03	REDUCE THE LOGGING SPEED OF THE GROSS GAMMA PROBES FOR THE 14 DRY WELLS AROUND 241-C-105 AND 241-C-106.	10/31/1992 (Completed)
M-05-13-T04	PROVIDE EPA AND ECOLOGY A PLAN FOR FURTHER IMPROVEMENTS IN GROSS GAMMA PROBE.	12/31/1992 (Completed)
M-05-14	THE USDOE SHALL PROVIDE TO EPA AND ECOLOGY AN INITIAL COMPREHENSIVE REPORT ON THE ALTERNATIVES IDENTIFIED IN THE ENGINEERING EVALUATION OF ALTERNATIVES. THE REPORT SHALL DISCUSS THE FEASIBILITY OF ALTERNATIVES IDENTIFIED, COSTS, OBSTACLES, ACCELERATED IMPLEMENTATION TIME SCHEDULES, AND RESOURCES TO IMPLEMENT THE APPROPRIATE ALTERNATIVE. THE REPORT WILL EMPHASIZE THE NEAR-TERM OPTIONS.	3/31/1993 (Completed)
M-05-15A	THE USDOE SHALL PROVIDE ADEQUATE IN-TANK MONITORING AT SINGLE-SHELL TANK T-101 BY REPLACING THE EXISTING FIC OR PROVIDING A MANUAL FLAKE BOX TYPE IN-TANK MONITORING DEVICE IN THE INTERIM TO PUMPING.	1/31/1993 (Completed)
M-05-15B	THE USDOE SHALL PROVIDE TO EPA AND ECOLOGY A LETTER REPORT ON IN-TANK LIQUID LEVEL DETECTION OPTIONS AVAILABLE FOR TANK T-101 CONSISTENT WITH THE REQUIREMENTS OF CHAPTER 173-303 WAC. IF THE LIQUID LEVEL REMAINS IN THIS TANK, AN ACCELERATED	3/31/1993 (Completed)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
	IMPLEMENTATION SCHEDULE FOR THE INSTALLATION OF THE PREFERRED OPTION FOR IN-TANK LIQUID LEVEL DETECTION SHALL BE PROVIDED WITHIN (60) DAYS OF THIS MILESTONE DUE DATE.	
M-05-16	THE USDOE SHALL COMPLETE ALL PHYSICAL PREPARATIONS FOR EMERGENCY PUMPING OF SINGLE SHELL TANK T-101, AND SHALL INITIATE FULL SCALE REMOVAL OF TANK T-101 LIQUIDS.	3/15/1993 (Completed)
M-05-17A	THE USDOE SHALL PROVIDE TO EPA AND ECOLOGY THE DRAFT CURRICULA FOR THE UPGRADED MAINTENANCE TRAINING PROGRAM AND AN IMPLEMENTATION SCHEDULE FOR THAT TRAINING.	6/30/1994 (Deleted)
M-05-17B	THE USDOE SHALL COMPLETE THE PORTIONS OF THE NUCLEAR OPERATOR SYSTEMS CLASS AND ON-THE-JOB TRAINING THAT RELATE TO THE OPERATOR ROUTINES AND LIQUID LEVEL MONITORING. DOCUMENTATION OF COMPLETION OF OPERATOR TRAINING SHALL BE PROVIDED BY SUBMITTAL OF A LETTER FROM USDOE TO EPA AND ECOLOGY.	12/31/1993 (Deleted)
M-05-17C	THE USDOE SHALL PROVIDE TO EPA AND ECOLOGY THE SCHEDULE FOR COMPLETING THE TRAINING FOR ALL OPERATIONS SUPERVISORS AND SHIFT MANAGERS IN ACCORDANCE WITH THE UPGRADED SUPERVISOR TRAINING PROGRAM. DOCUMENTATION OF COMPLETION OF THE FIRST CLASS FOR OPERATIONS SUPERVISORS AND SHIFT MANAGERS WILL ALSO BE PROVIDED.	6/30/1993 (Completed)
M-05-18A	THE USDOE SHALL PROVIDE TO EPA AND ECOLOGY THE REVISED DATA SHEETS AND ADMINISTRATIVE PROCEDURES RELEVANT TO MONITORING SINGLE-SHELL TANK T-101 LIQUID LEVEL DETECTION INSTRUMENTS AND IDENTIFYING AND REPORTING OUT OF SPECIFICATION READINGS.	1/31/1993 (Completed)
M-05-18B	THE USDOE SHALL PROVIDE TO EPA AND ECOLOGY THE REVISED PROCEDURES TO ACCOMPLISH CONTROLLING AND TRACKING DISCREPANCY REPORTS GENERATED TO DOCUMENT ADVERSE TRENDS OR DATA ANOMALIES IN THE HANFORD TANK FARM OPERATIONS.	1/31/1993 (Completed)
M-06-00	DEVELOP SINGLE-SHELL TANK WASTE RETRIEVAL TECHNOLOGY AND COMPLETE SCALE-MODEL TESTING. VARIOUS WASTE RETRIEVAL TECHNOLOGIES WILL BE EVALUATED FOR RETRIEVING EACH OF THE SEVERAL TYPES OF SINGLE-SHELL TANK WASTES. EMPHASIS WILL BE PLACED ON OPTIMIZING WASTE REMOVAL WHILE MINIMIZING PERSONNEL EXPOSURE. PROMISING TECHNOLOGIES WILL BE EVALUATED FOR EACH WASTE TYPE AND ONE OR MORE WILL BE SELECTED FOR TESTING USING SIMULATED WASTE IN A SCALE MODEL (MINIMUM 1:12 SCALE) TANK.	6/30/1994 (Deleted)
M-06-01	IDENTIFY WASTE RETRIEVAL TECHNOLOGIES TO BE TESTED IN SST SCALE-MODEL TANK (COMPLETE 10/10/90).	10/31/1990 (Completed)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-06-01--T1	INITIATE CONCEPTUAL DESIGN FOR SST TEST FACILITY. (COMPLETE 2-23-90)	1/31/1990 (Completed)
M-06-01--T2	ISSUE SST RETRIEVAL TECHNOLOGIES ENGINEERING STUDY (COMPLETE 6-28-90)	6/30/1990 (Completed)
M-06-02	INITIATE WASTE-RETRIEVAL TESTING IN SCALE-MODEL TANK.	10/31/1992 (Completed)
M-07-00	INITIATE FULL SCALE DEMONSTRATION OF SST WASTE RETRIEVAL TECHNOLOGY. A FULL-SCALE WASTE RETRIEVAL AT A PRE-SELECTED SINGLE-SHELL TANK WILL FOLLOW SCALE MODEL TESTING OF WASTE RETRIEVAL TECHNOLOGIES ((MILESTONE M-06-00). THIS DEMONSTRATION WILL BE COMPLETE WHEN IT SUCCEEDS IN REMOVING NO LESS THAN 95 PERCENT OF THE RADIOACTIVE AND CHEMICAL WASTE INVENTORY FROM THE SINGLE-SHELL TANK. IF ANY WASTE REMAINS IN THE TANK OR THE SURROUNDING SOIL, FINAL TANK CLOSURE WILL PROCEED UNDER AN APPROVED CLOSURE PLAN IN MILESTONE M-08 OR M-09. DEMONSTRATION INITIATION IS DEFINED AS STARTUP OF THE WASTE RETRIEVAL EQUIPMENT IN THE SELECTED SINGLE-SHELL TANK.	10/31/1997 (Deleted)
M-07-01	SUBMIT SST SELECTION CRITERIA, RETRIEVAL OPTIONS AND RECOMMENDED TANK SELECTION TO ECOLOGY FOR CONCURRENCE.	10/31/1993 (Completed)
M-07-02	ECOLOGY CONCURRENCE/NON-CONCURRENCE OF SST SELECTION CRITERIA, RETRIEVAL OPTIONS, AND TANK SELECTION.	12/31/1993 (Completed)
M-07-03	COMPLETE FINAL DESIGN FOR INSTALLATION OF PIPING AND OTHER REQUIRED SST WASTE REMOVAL EQUIPMENT.	12/31/1994 (Deleted)
M-07-04	SUBMIT COMPLETION DATE AND COMPLETION CRITERIA FOR FULL -SCALE DEMONSTRATION PROJECT TO ECOLOGY FOR CONCURRENCE.	10/31/1997 (Deleted)
M-07-05	ECOLOGY CONCURRENCE/NON-CONCURRENCE OF COMPLETION DATE/CRITERIA.	12/31/1997 (Deleted)
M-08-00	INITIATE FULL-SCALE TANK FARM CLOSURE DEMONSTRATION PROJECT. THE FULL-SCALE TANK FARM DEMONSTRATION PROJECT WILL INCLUDE WASTE RETRIEVAL AND THE INSTALLATION OF A FINAL COVER. DECISIONS AS TO THE APPROPRIATE DISPOSAL OF WASTES, TANKS, CONTAMINATED PIPING, AND SOILS WILL FOLLOW DETAILED CHARACTERIZATION AND REGULATORY AGENCY APPROVAL AS PART OF THE CLOSURE PROCESS. FOR PURPOSES OF THIS MILESTONE, INITIATION IS DEFINED AS FULL-SCALE WASTE RETRIEVAL. THE FULL-SCALE DEMONSTRATION WILL SERVE TO VERIFY THE VARIOUS TECHNOLOGIES BEING DEVELOPED FOR TANK FARM CLOSURES.	6/30/2004 (Deleted)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-08-01	SUBMIT TANK FARM SELECTION CRITERIA, CLOSURE METHOD(S), TANK FARM SELECTION RATIONALE, AND RECOMMENDED TANK FARM SELECTION TO ECOLOGY FOR APPROVAL.	1/31/1999 (Deleted)
M-08-02	COMPLETE FINAL DESIGN FOR THE INSTALLATION OF REQUIRED PIPING AND OTHER REQUIRED WASTE REMOVAL EQUIPMENT.	1/31/2001 (Deleted)
M-08-03	SUBMIT SST FARM CLOSURE PLAN FOR SELECTED TANK FARM TO ECOLOGY FOR APPROVAL.	12/31/2003 (Deleted)
M-09-00	COMPLETE CLOSURE OF ALL 149 SINGLE-SHELL TANKS. CLOSURE AND REMOVAL OF REQUIRED WASTE FROM THE 149 SINGLE-SHELL TANKS WILL BE EFFECTED IN ACCORDANCE WITH THE APPROVED CLOSURE PLAN(S). AS STATED IN THE HANFORD DEFENSE WASTE-ENVIRONMENTAL IMPACT STATEMENT RECORD OF DECISION, A SUPPLEMENTAL EIS WILL BE PREPARED PRIOR TO MAKING ANY FINAL DECISIONS REGARDING DISPOSAL OF SINGLE-SHELL TANK WASTE. THE FINAL CLOSURE PLAN(S) WILL ADDRESS THE RECOMMENDATIONS OF THE SUPPLEMENTAL EIS.	6/30/2018 (Deleted)
M-09-01	COMPLETE PREPARATION OF SST SUPPLEMENTAL EIS AND ISSUE DRAFT FOR PUBLIC REVIEW.	6/30/2002 (Deleted)
M-09-02	SUBMIT SST CLOSURE PLAN TO ECOLOGY FOR APPROVAL.	12/31/2003 (Deleted)
M-10-00	COMPLETE ANALYSES OF AT LEAST TWO COMPLETE CORE SAMPLES FROM EACH SINGLE-SHELL TANK. OBTAIN AND ANALYZE A MINIMUM OF TWO CORE SAMPLES FROM EACH SINGLE-SHELL TANK. SAMPLES WILL BE COLLECTED AND ANALYZED TO DETERMINE THE CHARACTERISTICS OF SIGNIFICANT WASTE STRATA TO SUPPORT TIMELY DEVELOPMENT OF TANK WASTE RETRIEVAL TECHNOLOGY AND TO ASSIST IN PREPARATION OF SINGLE-SHELL TANK CLOSURE PLANS AND THE SUPPLEMENTAL EIS. ADDITIONAL SAMPLING MAY BE DETERMINED TO BE NECESSARY TO ENSURE REPRESENTATIVE SAMPLES ARE OBTAINED FROM EACH TANK. SAMPLES WILL BE COLLECTED AND ANALYZED IN ACCORDANCE WITH A SINGLE-SHELL TANK WASTE ANALYSIS PLAN APPROVED BY ECOLOGY. DATA FROM THIS INITIAL CHARACTERIZATION MAY BE ADEQUATE TO IDENTIFY THOSE TANKS WHOSE WASTE WILL BE RETRIEVED. ADDITIONAL SAMPLING AND ANALYSIS WILL BE NECESSARY TO JUSTIFY ANY DECISION TO LEAVE WASTE IN PLACE.	9/30/1998 (Deleted)
M-10-01	SUBMIT DRAFT SST WASTE SAMPLING AND ANALYSIS PLAN TO NATIONAL ACADEMY OF SCIENCES, ECOLOGY, AND EPA.	3/31/1989 (Completed)
M-10-02	SUBMIT SST WASTE SAMPLING AND ANALYSIS PLAN TO ECOLOGY FOR APPROVAL.	5/31/1989 (Completed)
M-10-03	OBTAIN 15 CORE SAMPLES FROM 2 SSTs (REFERENCE SAMPLING TANKS).	12/31/1989 (Completed)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-10-04	OBTAIN 4 CORE SAMPLES FROM 2 SSTs.	9/30/1991 (Completed)
M-10-04-T01	READINESS COMPLETE TO PROCEED WITH PUSH-MODE CORE SAMPLING	6/30/1991 (Completed)
M-10-05	ISSUE "INTEGRATED PLAN - SAMPLING AND ANALYSIS OF HANFORD SITE WASTES MEASURING GREATER THAN 10 mREM PER HOUR".	3/31/1992 (Completed)
M-10-05-T01	ISSUE DRAFT OF INTEGRATED PLAN TO ECOLOGY	1/31/1992 (Completed)
M-10-06	OBTAIN 20 CORE SAMPLES FROM SINGLE SHELL TANKS (SSTs).	9/30/1992 (Completed)
M-10-07	OBTAIN 7 CORE SAMPLES FROM 3 SINGLE-SHELL TANKS AND 5 DIP SAMPLES FROM 5 DOUBLE-SHELL TANKS.	9/30/1993 (Completed)
M-10-08	OBTAIN 44 CORE SAMPLES FROM 22 TANKS.	9/30/1994 (Deleted)
M-10-09	OBTAIN 48 CORE SAMPLES FROM 24 TANKS.	9/30/1995 (Deleted)
M-10-10	OBTAIN 48 CORE SAMPLES FROM 24 TANKS.	9/30/1996 (Deleted)
M-10-11	OBTAIN 48 CORE SAMPLES FROM 24 TANKS.	9/30/1997 (Deleted)
M-10-12	OBTAIN 38 CORE SAMPLES FROM 19 TANKS.	9/30/1998 (Deleted)
M-10-13	RESTORE ROTARY MODE SAMPLING CAPABILITY AT THE HANFORD SITE.	3/31/1994 (Deleted)
M-10-13-T01	COMPLETION OF IMPROVED ORGANIC CLEAN-UP ANALYTICAL METHOD	1/31/1992 (Completed)
M-10-13-T02	COMPLETE R&D AND INSTALLATION OF BOTH THE HARD SALT CAKE SAMPLER AND THE IMPROVED HYDROSTATIC BALANCE SYSTEM	12/31/1992 (Completed)
M-11-00	COMPLETE CONSTRUCTION AND INITIATE OPERATIONS OF EXPANDED LABORATORY HOT CELLS FOR HIGH-LEVEL RADIOACTIVE MIXED WASTE. THE EXPANDED LABORATORY HOT CELLS WILL PROVIDE ANALYTICAL CAPABILITIES FOR WASTE ANALYSES FROM SINGLE-SHELL TANKS, DOUBLE-SHELL TANKS, AND B PLANT PRETREATMENT PROCESSING. THE HOT CELLS WILL PROVIDE AT LEAST DOUBLE THE SAMPLE THROUGH-PUT CAPACITY FROM THAT WHICH IS CURRENTLY AVAILABLE AT THE 222-S LABORATORY.	6/30/1994

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-11-00--T1	COMPLETE CONSTRUCTION FOR HOT CELL EXPANSION	3/31/1994
M-11-01	COMPLETE CONCEPTUAL DESIGN FOR HOT CELL EXPANSION.	6/30/1989 (Completed)
M-11-02	COMPLETE DEFINITIVE DESIGN FOR HOT CELL EXPANSION.	3/31/1992 (Completed)
M-12-00	SUBMIT RI/FS OR RFI/CMS WORK PLANS FOR 15 OPERABLE UNITS.	6/30/1992 (Completed)
M-12-01	SUBMIT 1100-EM-1 OPERABLE UNIT WORK PLAN (GROUNDWATER AND SOURCE OPERABLE UNIT).	1/31/1989 (Completed)
M-12-02	SUBMIT 200-BP-1 OPERABLE UNIT WORK PLAN (GROUNDWATER AND SOURCE OPERABLE UNIT).	2/28/1989 (Completed)
M-12-03	SUBMIT 300-FF-1 OPERABLE UNIT WORK PLAN (SOURCE OPERABLE UNIT).	3/31/1989 (Completed)
M-12-04	SUBMIT 300-FF-5 OPERABLE UNIT WORK PLAN AS ADDENDUM TO 300-FF-1 (GROUNDWATER OPERABLE UNIT).	9/30/1989 (Completed)
M-12-05	SUBMIT 100-HR-1 OPERABLE UNIT WORK PLAN (SOURCE OPERABLE UNIT).	6/30/1989 (Completed)
M-12-05A	SUBMIT RESCOPED RFI/CMS WORK PLAN 100-HR-1 OPERABLE UNIT, IN ACCORDANCE WITH FINAL "HANFORD PAST-PRACTICE STRATEGY DOCUMENT".	9/30/1991 (Completed)
M-12-06	SUBMIT 100-HR-3 OPERABLE UNIT WORK PLAN (GROUNDWATER OPERABLE UNIT).	6/30/1989 (Completed)
M-12-06A	SUBMIT RESCOPED RFI/CMS WORK PLAN FOR 100-HR-3 OPERABLE UNIT, IN ACCORDANCE WITH FINAL "HANFORD PAST-PRACTICE STRATEGY DOCUMENT".	9/30/1991 (Completed)
M-12-07	SUBMIT 100-DR-1 OPERABLE UNIT WORK PLAN (SOURCE OPERABLE UNIT).	10/31/1989 (Completed)
M-12-07A	SUBMIT RESCOPED RFI/CMS WORK PLAN 100-DR-1 OPERABLE UNIT, IN ACCORDANCE WITH FINAL "HANFORD PAST-PRACTICE STRATEGY DOCUMENT".	9/30/1991 (Completed)
M-12-08	SUBMIT 100-BC-1 OPERABLE UNIT WORK PLAN (SOURCE OPERABLE UNIT). (COMPLETE 4-9-90)	6/30/1990 (Completed)
M-12-08--T1	SUBMIT 100-BC-1 RI/FS/ WORK PLAN FOR DOE REVIEW. (COMPLETE 4-9-90)	3/31/1990 (Completed)
M-12-08--T2	COMPLETE 100-BC-1 PRELIMINARY FIELD ACTIVITIES (COMPLETE 6-30-90)	6/30/1990 (Completed)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-12-08A	SUBMIT RESCOPED RI/FS WORK PLAN 100-BC-1 OPERABLE UNIT, IN ACCORDANCE WITH FINAL "HANFORD PAST PRACTICE STRATEGY DOCUMENT".	9/30/1991 (Completed)
M-12-09	SUBMIT 100-BC-5 OPERABLE UNIT WORK PLAN (GROUNDWATER OPERABLE UNIT). (COMPLETE 4-9-90)	6/30/1990 (Completed)
M-12-09--T1	SUBMIT 100-BC-5 (GROUNDWATER OPERABLE UNIT) RI/FS WORK PLAN FOR DOE REVIEW (COMPLETE 4-9-90)	3/31/1990 (Completed)
M-12-09--T2	COMPLETE 100-BC-5 WORK PLAN PRELIMINARY FIELD ACTIVITIES (COMPLETE 6-30-90)	6/30/1990 (Completed)
M-12-09A	SUBMIT RESCOPED RI/FS WORK PLAN 100-BC-5 OPERABLE UNIT, IN ACCORDANCE WITH FINAL "HANFORD PAST-PRACTICE STRATEGY DOCUMENT"	9/30/1991 (Completed)
M-12-10	SUBMIT 100-KR-1 OPERABLE UNIT WORK PLAN (SOURCE OPERABLE UNIT). (COMPLETE 6-15-90)	8/31/1990 (Completed)
M-12-10--T1	SUBMIT 100-KR-1 RI/FS WORK PLAN FOR DOE REVIEW (COMPLETE 6-15-90)	5/30/1990 (Completed)
M-12-10--T2	COMPLETE 100-KR-1 WORK PLAN PRELIMINARY FIELD ACTIVITIES (COMPLETE 6-15-90)	8/31/1990 (Completed)
M-12-10A	SUBMIT RESCOPED RI/FS WORK PLAN 100-KR-1 OPERABLE UNIT, IN ACCORDANCE WITH FINAL "HANFORD PAST-PRACTICE STRATEGY DOCUMENT".	10/30/1991 (Completed)
M-12-11	SUBMIT 100-KR-4 OPERABLE UNIT WORK PLAN (GROUNDWATER OPERABLE UNIT). (COMPLETE 6-15-90)	8/31/1990 (Completed)
M-12-11--T1	SUBMIT 100-KR-4 RI/FS WORK PLAN FOR DOE REVIEW (COMPLETE 6-15-90)	5/31/1990 (Completed)
M-12-11--T2	COMPLETE 100-KR-4 WORK PLAN (GROUNDWATER OPERABLE UNIT) PRELIMINARY FIELD ACTIVITIES (COMPLETE 8-3-90)	8/31/1990 (Completed)
M-12-11A	SUBMIT RESCOPED RI/FS WORK PLAN 100-KR-4 OPERABLE UNIT, IN ACCORDANCE WITH FINAL "HANFORD PAST-PRACTICE STRATEGY DOCUMENT".	10/31/1991 (Completed)
M-12-12	SUBMIT 100-NR-1 OPERABLE UNIT WORK PLAN (SOURCE AND GROUNDWATER OPERABLE UNIT). (COMPLETE 10/31/90)	12/31/1990 (Completed)
M-12-12--T1	SUBMIT 100-NR-1 RFI/CMS WORK PLAN FOR DOE REVIEW.	9/30/1990 (Completed)
M-12-12--T2	COMPLETE 100-NR-1 RFI/CMS WORK PLAN SCOPING ACTIVITIES.	10/31/1990 (Completed)



Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-12-12A	SUBMIT RESCOPED RFI/CMS WORK PLAN 100-NR-1 OPERABLE UNIT, IN ACCORDANCE WITH FINAL "HANFORD PAST-PRACTICE STRATEGY DOCUMENT".	12/31/1991 (Completed)
M-12-13	SUBMIT 100-FR-1 OPERABLE UNIT WORK PLAN (SOURCE AND GROUNDWATER OPERABLE UNIT).	4/30/1991 (Completed)
M-12-13--T1	SUBMIT 100-FR-1 RI/FS WORK PLAN FOR DOE REVIEW	1/31/1991 (Completed)
M-12-13--T2	COMPLETE 100-FR-1 RI/FS WORK PLAN SCOPING ACTIVITIES.	11/30/1990 (Completed)
M-12-13A	SUBMIT RESCOPED RI/FS WORK PLANS FOR 100-FR-1 AND 100-FR-3 OPERABLE UNITS, IN ACCORDANCE WITH FINAL "HANFORD PAST-PRACTICE STRATEGY DOCUMENT".	11/30/1991 (Completed)
M-12-14	SUBMIT 100-NR-3 OPERABLE UNIT WORK PLAN (SOURCE AND GROUNDWATER OPERABLE UNIT).	12/31/1990 (Completed)
M-12-14--T1	SUBMIT 100-NR-3 RI/FS WORK PLAN TO DOE FOR REVIEW.	9/30/1990 (Completed)
M-12-14--T2	COMPLETE 100-NR-3 RI/FS WORK PLAN SCOPING ACTIVITIES.	6/30/1990 (Completed)
M-12-14A	SUBMIT RESCOPED RFI/CMS WORK PLAN FOR 100-NR-2 OPERABLE UNIT, IN ACCORDANCE WITH THE FINAL "HANFORD PAST PRACTICE STRATEGY DOCUMENT".	12/31/1991 (Completed)
M-12-15	SUBMIT 200-UP-2 OPERABLE UNIT WORK PLAN OR AN AGREED UPON ALTERNATIVE WORK PLAN BASED ON RESULTS OF THE U-PLANT AGGREGATE AREA MANAGEMENT STUDY.	8/31/1992 (Completed)
M-12-15--T1	SUBMIT 200-UP-2 RI/FS WORK PLAN TO DOE FOR REVIEW	3/31/1991 (Completed)
M-12-15--T2	COMPLETE 200-UP-2 RI/FS WORK PLAN SCOPING ACTIVITIES (COMPLETE 11-30-90)	11/30/1990 (Completed)
M-12-16	SUBMIT 100-BC-2 OPERABLE UNIT WORK PLAN (SOURCE AND GROUNDWATER OPERABLE UNIT).	8/31/1991 (Deleted)
M-12-17	SUBMIT 200-BP-5 OPERABLE UNIT WORK PLAN (SOURCE AND GROUNDWATER OPERABLE UNIT).	10/31/1991 (Deleted)
M-12-18	SUBMIT 100-OR-2 OPERABLE UNIT WORK PLAN (SOURCE OPERABLE UNIT).	12/31/1991 (Deleted)
M-12-19	SUBMIT 200-ZP-1 OPERABLE UNIT WORK PLAN (SOURCE AND GROUNDWATER OPERABLE UNIT).	2/28/1992 (Deleted)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-12-20	SUBMIT 100-KR-2 OPERABLE UNIT WORK PLAN (SOURCE AND GROUNDWATER OPERABLE UNIT).	4/30/1992 (Deleted)
M-13-00A	SUBMIT SIX RI/FS OR RFI/CMS WORK PLANS (INCLUDES M-12-19 AND M-12-20).	12/31/1992 (Deleted)
M-13-00B	SUBMIT SIX RI/FS OR RFI/CMS WORK PLANS.	12/31/1993 (Completed)
M-13-00C	SUBMIT SIX RI/FS OR RFI/CMS WORK PLANS.	12/31/1994
M-13-00D	SUBMIT SIX RI/FS OR RFI/CMS WORK PLANS.	12/31/1995
M-13-00E	SUBMIT SIX RI/FS OR RFI/CMS WORK PLANS.	12/31/1996
M-13-00F	SUBMIT SIX RI/FS OR RFI/CMS WORK PLANS.	12/31/1997
M-13-00G	SUBMIT SIX RI/FS OR RFI/CMS WORK PLANS.	12/31/1998
M-13-00H	SUBMIT SIX RI/FS OR RFI/CMS WORK PLANS.	12/31/1999
M-13-01	SUBMIT DRAFT WORK PLAN TO EPA AND ECOLOGY FOR OPERABLE UNIT 100-BC-2.	5/21/1993 (Completed)
M-13-02	SUBMIT DRAFT WORK PLAN TO EPA AND ECOLOGY FOR OPERABLE UNIT 200-UP-1.	4/30/1993 (Completed)
M-13-02A	BEGIN PILOT-SCALE PUMP AND TREAT OPERATIONS FOR 200-UP-1 30 DAYS AFTER THE LIMITED FIELD INVESTIGATION WORKPLAN IS APPROVED BUT NO SOONER THAN MARCH 31, 1994.	3/31/1994
M-13-03	SUBMIT DRAFT WORK PLAN TO EPA AND ECOLOGY FOR OPERABLE UNIT 100-HR-2.	6/30/1993 (Completed)
M-13-04	SUBMIT DRAFT 200-ZP-1 INTERIM REMEDIAL MEASURES PROPOSED PLAN.	9/30/1993 (Completed)
M-13-04A	BEGIN PILOT-SCALE PUMP AND TREAT OPERATIONS FOR 200-ZP-1 30 DAYS AFTER THE INTERIM RECORD OF DECISION IS ISSUED BUT NO SOONER THAN FEBRUARY 28, 1994.	3/31/1994
M-13-05	SUBMIT DRAFT WORK PLAN TO EPA AND ECOLOGY FOR OPERABLE UNIT 100-DR-2.	10/31/1993 (Completed)
M-13-06	SUBMIT DRAFT TREATABILITY TEST PLAN FOR OPERABLE UNIT 200-BP-5.	1/31/1994 (Completed)
M-13-06A	BEGIN PILOT-SCALE PUMP AND TREAT OPERATIONS FOR 200-BP-5 30 DAYS AFTER THE TREATABILITY TEST PLAN IS APPROVED BUT NO SOONER THAN AUGUST 31, 1994.	8/31/1994
M-13-07	SUBMIT INTEGRATED 200-BP-11 SOURCE OPERABLE UNIT AND 216-B-3 POND WORK/CLOSURE PLAN TO ECOLOGY AND EPA.	9/30/1994

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-13-08	ISSUE LIMITED FIELD INVESTIGATION WORKPLAN FOR THE 300-FF-2 EXPANDED OPERABLE UNIT FOR REGULATOR REVIEW.	11/30/1994
M-13-80	SUBMIT COMPENDIUM OF EXISTING COLUMBIA RIVER CONTAMINANT DATA TO EPA AND ECOLOGY.	4/30/1994
M-13-80A	COMPLETE COLUMBIA RIVER CONTAMINANT WORKSHOPS.	6/30/1994
M-13-80B	SUBMIT THE COLUMBIA RIVER COMPREHENSIVE IMPACT ASSESSMENT TO EPA AND ECOLOGY (HUMAN HEALTH AND ENVIRONMENTAL RISK ASSESSMENT).	TBD
M-13-81	SUBMIT WORK PLAN ON THE HANFORD GROUNDWATER REMEDIATION STRATEGY TO EPA AND ECOLOGY.	8/31/1994
M-13-81A	SUBMIT WORK PLAN ON THE HANFORD GROUNDWATER PROTECTION MANAGEMENT PLAN TO EPA AND ECOLOGY.	10/31/1994
M-14-00	DOE SHALL COMPLY WITH SENIOR EXECUTIVE COMMITTEE AGREEMENT ON RESOLUTION OF MILESTONE M-14-00 CHANGE REQUEST DISPUTE (DATED 1/8/93). (FORMALLY TITLED "COMPLETE CONSTRUCTION AND INITIATE OPERATIONS OF A LOW-LEVEL MIXED WASTE LAB").	10/31/1995
M-14-00--TI	COMPLETE CONSTRUCTION OF LOW-LEVEL MIXED WASTE LABORATORY	9/30/1991 (Deleted)
M-14-01	COMPLETE DEFINITIVE DESIGN FOR A LOW-LEVEL MIXED WASTE LABORATORY (W-011H).	11/30/1990 (Completed)
M-14-02	COMPLETE CONSTRUCTION OF 27 MODULE WASTE SAMPLING AND CHARACTERIZATION FACILITY (WSCF) (SCOPE PROVIDES QA/QC TO COMMERCIAL SERVICES AND PROCESS CONTROL SUPPORT FOR LIQUID EFFLUENTS).	10/31/1993 (Completed)
M-14-03	INITIATE OPERATIONS OF 27 MODULE WSCF.	4/30/1994
M-14-04	DOE WILL PROCEED WITH PROCUREMENT ACTIONS TO PROVIDE LOW-LEVEL MIXED WASTE COMMERCIAL LABORATORY CAPACITY SUFFICIENT TO MEET TRI-PARTY AGREEMENT COMPLIANCE REQUIREMENTS. NEAR-TERM LABORATORY CAPACITY WILL NOT BE SPECIFICALLY CONSTRAINED TO LOCAL SERVICES. HOWEVER, TO ENSURE COMPLIANCE WITH THE INTENT OF THE TRI-PARTY AGREEMENT MILESTONE, RL WILL PROVIDE FOR PROCUREMENT OF LOCALLY-PROVIDED LABORATORY SERVICES FOR THE LONG TERM DESIGNED TO HANDLE 80% OR MORE OF THE LOW-LEVEL ANALYTICAL REQUIREMENTS FOR THE ENVIRONMENTAL RESTORATION/WASTE MANAGEMENT PROGRAMS AT THE HANFORD SITE. THE DATE FOR COMMENCEMENT OF LOCAL OPERATIONS WILL BE OCTOBER, 1995.	10/31/1995
M-15-00	COMPLETE THE RI/FS (OR RFI/CMS) PROCESS FOR ALL OPERABLE UNITS.	9/30/2005

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Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-15-01A	SUBMIT DRAFT 1100-EM-1 FEASIBILITY STUDY PHASE 1 & 2 REPORT TO EPA AND ECOLOGY FOR REVIEW.	12/31/1990 (Completed)
M-15-01A-T1	COMPLETE GROUND WATER MONITORING WELLS FOR 1100-EM-1 (COMPLETE 2-12-90)	1/31/1990 (Completed)
M-15-01A-T2	SUBMIT RI PHASE-I REPORT FOR 1100-EM-1 TO EPA/ECOLOGY (COMPLETE 8-30-90)	7/31/1990 (Completed)
M-15-01A-T3	SUBMIT WORK PLAN SUPPLEMENT FOR 1100-EM-1 (COMPLETE 9-28-90)	9/30/1990 (Completed)
M-15-01B	SUBMIT DRAFT RI PHASE I AND II REPORT FOR 1100-EM-1 (THIS IS ONE PART OF MILESTONE KNOWN AS M-15-01B/C).	10/31/1991 (Deleted)
M-15-01B-T1	SUBMIT RI PHASE I REPORT TO EPA AND ECOLOGY FOR REVIEW	8/31/1990 (Completed)
M-15-01B/C	SUBMIT FINAL 1100-EM-1 REMEDIAL INVESTIGATION/FEASIBILITY STUDY REPORT TO EPA AND ECOLOGY FOR REVIEW.	12/31/1992 (Completed)
M-15-01C	SUBMIT DRAFT FS III REPORT / PROPOSED PLAN FOR 1100-EM-1 (THIS IS ONE PART OF MILESTONE KNOWN AS M-15-01B/C).	12/31/1992 (Deleted)
M-15-02A	SUBMIT 200-BP-1 DRAFT FEASIBILITY STUDY PHASE 1 AND 2 REPORT TO EPA AND ECOLOGY FOR REVIEW.	6/30/1993 (Deleted)
M-15-02B	SUBMIT 200-BP-1 DRAFT REMEDIAL INVESTIGATION PHASE 2 REPORT TO EPA AND ECOLOGY FOR REVIEW.	4/30/1994 (Deleted)
M-15-02B-T1	SUBMIT 200-BP-1 RI PHASE-1 REPORT	3/31/1993 (Completed)
M-15-02C	SUBMIT 200-BP-1 DRAFT FEASIBILITY STUDY PHASE 3 REPORT AND PROPOSED PLAN TO EPA AND ECOLOGY FOR REVIEW.	3/31/1995 (Deleted)
M-15-02D	SUBMIT DRAFT PHASE I, II, AND III FS FOR THE 200-BP-1 SOURCE AREA.	6/30/1993 (Completed)
M-15-02E	SUBMIT A DRAFT CONSTRUCTIBILITY REPORT ON THE HANFORD BARRIER PROTOTYPE DEMONSTRATION AT THE 216-B-57 CRIB.	7/31/1994
M-15-02E-T1	DOE WILL SUBMIT TO EPA/ECOLOGY THE FINAL FEASIBILITY STUDY REPORT.	1/31/1994 (Completed)
M-15-02E-T2	DOE WILL SUBMIT TO EPA/ECOLOGY THE 200-BP-1 PROPOSED PLAN.	1/31/1994 (Completed)
M-15-02E-T3	EPA WILL ISSUE A FINAL ROD FOR THE 200-BP-1 OU.	6/01/1994

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-15-02E-T4	DOE WILL SUBMIT A DEFINITIVE DESIGN FOR THE MODIFIED RCRA BARRIER TO EPA/ECOLOGY 2 MONTHS AFTER THE ROD IS ISSUED BUT NO SOONER THAN AUGUST 1, 1994	8/01/1994
M-15-02E-T5	DOE WILL SUBMIT A REMEDIAL ACTION PLAN TO EPA/ECOLOGY 4 MONTHS AFTER THE ROD IS ISSUED BUT NO SOONER THAN OCTOBER 1, 1994.	10/01/1994
M-15-02E-T6	DOE WILL COMPLETE THE BID AND AWARD CYCLE FOR THE FINAL BARRIER 8 MONTHS AFTER THE ROD ISSUED BUT NO SOONER THAN FEBRUARY 15, 1995.	2/15/1995
M-15-02E-T7	DOE WILL COMPLETE REMEDIATION ACTIVITIES AT THE 200-BP-1 OU 15 MONTHS AFTER THESE ROD IS ISSUED BUT NO SOONER THAN OCTOBER 1, 1995.	10/01/1995
M-15-03--T1	SUBMIT 300-FF-1 SUPPLEMENTAL WORK PLAN	9/15/1992 (Completed)
M-15-03A	SUBMIT 300-FF-1 DRAFT FEASIBILITY STUDY PHASE 1 AND 2 REPORT TO EPA AND ECOLOGY FOR REVIEW.	9/15/1992 (Completed)
M-15-03B	SUBMIT 300-FF-1 DRAFT REMEDIAL INVESTIGATION PHASE 3 REPORT TO EPA AND ECOLOGY FOR REVIEW.	12/15/1993 (Completed)
M-15-03C	SUBMIT 300-FF-1 DRAFT FEASIBILITY STUDY PHASE 3 REPORT TO EPA AND ECOLOGY FOR REVIEW.	8/15/1994
M-15-04--T1	SUBMIT 300-FF-5 SUPPLEMENTAL WORK PLAN	2/28/1991 (Completed)
M-15-04A	SUBMIT 300-FF-5 DRAFT FEASIBILITY STUDY PHASE 1 AND 2 TO EPA AND ECOLOGY FOR REVIEW.	7/15/1993 (Completed)
M-15-04B	SUBMIT 300-FF-5 DRAFT REMEDIAL INVESTIGATION PHASE 2 REPORT TO EPA AND ECOLOGY FOR REVIEW.	8/15/1994 (Deleted)
M-15-04B/C	SUBMIT 300-FF-5 DRAFT COMBINED PHASE 2 RI AND PHASE 3 FS REPORT TO EPA AND ECOLOGY.	1/31/1995
M-15-04C	SUBMIT 300-FF-5 DRAFT FEASIBILITY STUDY PHASE 3 REPORT TO EPA AND ECOLOGY FOR REVIEW.	6/15/1995 (Deleted)
M-15-05A	SUBMIT THE 100-HR-1 OU LIMITED INVESTIGATION REPORT TO ECOLOGY AND EPA.	8/09/1993 (Completed)
M-15-05B	COMPLETE 100-HR-1 OU TREATABILITY STUDY ACTIVITIES.	11/30/1993 (Completed)
M-15-05C	SUBMIT THE 100-HR-1 FOCUSED FEASIBILITY STUDY REPORT TO ECOLOGY AND EPA.	9/30/1994

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-15-05D	SUBMIT THE 100-HR-1 OU INTERIM REMEDIAL MEASURES PROPOSED PLAN TO ECOLOGY AND EPA.	9/30/1994
M-15-06A	SUBMIT THE 100-HR-3 OU LIMITED FIELD INVESTIGATION REPORT TO ECOLOGY AND EPA.	10/31/1993 (Completed)
M-15-06B	COMPLETE 100-HR-3 OU TREATABILITY STUDY ACTIVITIES.	11/30/1993 (Completed)
M-15-06C	SUBMIT THE 100-HR-3 OU FOCUSED FEASIBILITY STUDY REPORT TO ECOLOGY AND EPA.	9/30/1994
M-15-06D	SUBMIT THE 100-HR-3 OU INTERIM REMEDIAL MEASURES PROPOSED PLAN TO ECOLOGY AND EPA.	9/30/1994
M-15-06E	BEGIN PILOT-SCALE PUMP AND TREAT OPERATIONS FOR 100-HR-3.	8/31/1994
M-15-07A	SUBMIT THE 100-DR-1 OU LIMITED FIELD INVESTIGATION REPORT TO ECOLOGY AND EPA.	8/09/1993 (Completed)
M-15-07B	COMPLETE 100-DR-1 OU TREATABILITY STUDY ACTIVITIES. INTERIM MILESTONE COMPLETION DATE: AUGUST 31, 1994. THE MILESTONE DATE WILL ALLOW FOR A SOIL WASHING PILOT SCALE TEST ACTIVITY. THE PILOT SCALE TEST WILL BE CONDUCTED AT THE SITE WITH THE MOST FAVORABLE TEST CONDITIONS, WHICH MAY OR MAY NOT BE WITHIN THE 100-DR-1 OU. THE TEST SITE WILL BE AGREED TO BY ALL PARTIES BEFORE INITIATING THE TEST.  IF SOIL WASHING LAB/BENCH SCALE TESTS PROVE THAT IT IS NOT A VIABLE OPTION AND PILOT SCALE SOIL WASHING TEST IS NOT CONDUCTED, THEN VITRIFICATION OF BURIAL GROUND MATERIALS (MOCK OR ACTUAL TBD) WILL COUNT FOR THE 100-DR-1 MILESTONE. THE PURPOSE OF THIS TEST IS TO EVALUATE VITRIFICATION AS A METHOD TO STABILIZE COMPACTABLE BURIAL GROUND MATERIALS THAT HAVE BEEN EXCAVATED AND RE-DISPOSED IN A CENTRAL LANDFILL.	8/31/1994
M-15-07C	SUBMIT THE 100-DR-1 OU FOCUSED FEASIBILITY STUDY REPORT TO ECOLOGY AND EPA.	9/30/1994
M-15-07D	SUBMIT THE 100-DR-1 OU INTERIM REMEDIAL MEASURES PROPOSED PLAN TO ECOLOGY AND EPA.	9/30/1994
M-15-08A	SUBMIT VALIDATED DATA OF ALL SAMPLING ACTIVITIES ASSOCIATED WITH SECTION 5.1.1.2, "SOURCE INVESTIGATIONS," AND SECTION 5.1.1.5 VADOSE ZONE INVESTIGATIONS" FOR 100-BC-1 OU TO ECOLOGY AND EPA. THIS INTERIM MILESTONE DOES NOT INCLUDE 116-C-5 VADOSE TEST PIT WORK SCOPE. INTERIM MILESTONE COMPLETION DATE: OCTOBER 1992.	10/09/1992 (Completed)

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Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-15-08B	SUBMIT THE 100-BC-1 OU LIMITED FIELD INVESTIGATION REPORT TO ECOLOGY AND EPA.	7/31/1993 (Completed)
M-15-08C	SUBMIT THE 100-BC-1 OU TREATABILITY STUDY REPORT TO ECOLOGY AND EPA.	1/31/1994 (Completed)
M-15-08D	SUBMIT THE 100-BC-1 OU FOCUSED FEASIBILITY STUDY REPORT TO ECOLOGY AND EPA.	11/30/1994
M-15-09A	SUBMIT VALIDATED DATA OF ALL SAMPLING ACTIVITIES ASSOCIATED WITH SECTION 5.1.1.5, "VADOSE ZONE INVESTIGATIONS," AND SECTION 5.1.1.6, GROUNDWATER INVESTIGATIONS," FOR 100-BC-5 OU TO ECOLOGY AND EPA.	12/31/1992 (Completed)
M-15-09B	SUBMIT THE 100-BC-5 OU LIMITED FIELD INVESTIGATION REPORT TO ECOLOGY AND EPA.	8/31/1993 (Completed)
M-15-09C	SUBMIT THE 100-BC-5 FOCUSED FEASIBILITY STUDY REPORT TO ECOLOGY AND EPA.	10/31/1994
M-15-09D	SUBMIT THE 100-BC-5 OU IRM PROPOSED PLAN TO ECOLOGY AND EPA.	10/31/1994
M-15-10A	SUBMIT VALIDATED DATA OF ALL SAMPLING ACTIVITIES ASSOCIATED WITH SECTION 5.1.1.2, "SOURCE INVESTIGATIONS," AND SECTION 5.1.1.5, "VADOSE ZONE INVESTIGATIONS" FOR 100-KR-1 OU TO ECOLOGY AND EPA.	10/31/1993 (Completed)
M-15-10B	SUBMIT THE 100-KR-1 OU LIMITED FIELD INVESTIGATION REPORT TO ECOLOGY AND EPA.	8/31/1994
M-15-10C	SUBMIT THE 100-KR-1 OU FOCUSED FEASIBILITY STUDY REPORT AND THE 100-KR-1 OU IRM PROPOSED PLAN TO ECOLOGY AND EPA.	4/30/1995
M-15-11A	SUBMIT VALIDATED DATA OF ALL SAMPLING ACTIVITIES ASSOCIATED WITH SECTION 5.1.1.6, "GROUNDWATER INVESTIGATION", FOR 100-KR-4 OU TO ECOLOGY AND EPA. INTERIM MILESTONE COMPLETION DATE: MARCH 12, 1993.	3/12/1993 (Completed)
M-15-11B	SUBMIT THE 100-KR-4 OU LIMITED FIELD INVESTIGATION REPORT TO ECOLOGY AND EPA.	1/12/1994 (Completed)
M-15-11C	SUBMIT THE 100-KR-4 OU FOCUSED FEASIBILITY STUDY REPORT TO ECOLOGY AND EPA.	10/31/1994
M-15-11D	SUBMIT THE 100-KR-4 OU IRM PROPOSED PLAN TO ECOLOGY AND EPA.	10/31/1994
M-15-13A	SUBMIT VALIDATED DATA OF ALL SAMPLING ACTIVITIES ASSOCIATED WITH SECTION 5.1.1.2 "SOURCE INVESTIGATIONS," AND SECTION 5.1.1.5, "VADOSE ZONE INVESTIGATIONS" FOR 100-FR-1 OU TO ECOLOGY AND EPA.	11/30/1993 (Completed)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-15-13B	SUBMIT THE 100-FR-1 OU LIMITED FIELD INVESTIGATION REPORT TO ECOLOGY AND EPA.	9/30/1994
M-15-13C	SUBMIT THE 100-FR-1 OU FOCUSED FEASIBILITY STUDY REPORT TO ECOLOGY AND EPA.	5/31/1995
M-15-13D	SUBMIT THE 100-FR-1 OU IRM PROPOSED PLAN TO ECOLOGY AND EPA.	5/31/1995
M-15-13E	SUBMIT VALIDATED DATA OF ALL SAMPLING ACTIVITIES ASSOCIATED WITH SECTION 5.1.1.6, "GROUNDWATER INVESTIGATION," FOR 100-FR-3 OU TO ECOLOGY AND EPA. INTERIM MILESTONE COMPLETION DATE: JUNE 14, 1993.	6/14/1993 (Completed)
M-15-13F	SUBMIT THE 100-FR-3 OU LIMITED FIELD INVESTIGATION REPORT TO ECOLOGY AND EPA.	4/14/1994
M-15-13G	SUBMIT THE 100-FR-3 OU FOCUSED FEASIBILITY STUDY REPORT TO ECOLOGY AND EPA.	12/14/1994
M-15-13H	SUBMIT THE 100-FR-3 OU IRM PROPOSED PLAN TO ECOLOGY AND EPA.	12/14/1994
M-15-14	ISSUE LIMITED FIELD INVESTIGATION WORK PLAN FOR REGULATORY REVIEW .	9/30/1994
M-15-16A	SUBMIT TO THE EPA AND ECOLOGY THE 100-B AREA BURIAL GROUND TEST PLAN.	5/31/1994
M-15-16A-T1	FINALIZE THE SCOPE OF WORK FOR THE 100-B AREA BURIAL GROUND TREATABILITY TEST BEFORE STARTING THE TEST PLAN.	2/15/1994 (Completed)
M-15-16B	COMMENCE REMEDIAL FIELD WORK FOR THE 100-B AREA BURIAL GROUND.	8/31/1994
M-15-16C	SUBMIT TO THE EPA AND ECOLOGY A 100-B AREA BURIAL GROUND FIELD WORK REPORT.	5/31/1995
M-16-00	COMPLETE THE REMEDIAL ACTIONS FOR ALL OPERABLE UNITS. REMEDIAL ACTIONS WILL BE COMPLETED FOR EACH OPERABLE UNIT IN ACCORDANCE WITH THE SCHEDULES DEVELOPED AS PART OF THE REMEDIAL DESIGN (RD)/REMEDIAL ACTION (RA) OR CORRECTIVE MEASURE IMPLEMENTATION (CMI) WORK PLAN.	9/30/2018
M-16-80	SUBMIT TO THE U.S. ENVIRONMENTAL PROTECTION AGENCY AND THE STATE OF WASHINGTON DEPARTMENT OF ECOLOGY THE ENGINEERING EVALUATION/COST ANALYSIS (EE/CA) FOR THE 100 AREA REACTOR EFFLUENT PIPELINE REMOVAL.	9/30/1994
M-16-81	COMPLETE REMEDIATION AND SUBMIT DRAFT CERCLA CONSTRUCTION COMPLETION REPORT FOR THE ENTIRE ALE RESERVE.	10/31/1994



Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-16-82	COMPLETE REMEDIATION AND SUBMIT DRAFT CERCLA ACTION ASSESSMENT REPORT FOR THE NORTH SLOPE.	10/31/1994
M-17-00--T1	COMPLETE BAT EVALUATION FOR PUREX STEAM CONDENSATE (COMPLETE 2-28-90)	2/28/1990 (Completed)
M-17-00--T2	ESTABLISH SCHEDULE AND SUBMIT CHANGE PACKAGE TO ADD TARGET DATES FOR PUREX STEAM CONDENSATE (COMPLETE 6-30-90)	6/30/1990 (Completed)
M-17-00--T3	COMPLETE BAT EVALUATION FOR UO3 PLANT PROCESS CONDENSATE (COMPLETE 4-30-90)	4/30/1990 (Completed)
M-17-00--T4	ESTABLISH SCHEDULE AND SUBMIT CHANGE PACKAGE TO ADD TARGET DATES FOR UO3 PLANT PROCESS CONDENSATE (COMPLETE 6-30-90)	6/30/1990 (Completed)
M-17-00--T5	COMPLETE DEFINITIVE DESIGN FOR PFP WASTEWATER TREATMENT (B-680) (SUPERSEDED BY M-17-16C)	12/31/1990 (Completed)
M-17-00--T6	COMPLETE CONSTRUCTION OF AQUEOUS MAKEUP UNIT (AMU) INSTALLMENT UPGRADE AND SPILL CONTAINMENT (C-035) (COMPLETE 3-31-90)	3/31/1990 (Completed)
M-17-00--T7	COMPLETE DEFINITIVE DESIGN OF THE B PLANT PROCESS CONDENSATE TREATMENT FACILITY (W-007H) (DELETED)	7/31/1990 (Deleted)
M-17-00--T8	COMPLETE CONSTRUCTION OF T PLANT 211-T CHEMICAL STORAGE (C-027) (COMPLETE 6-30-90)	9/30/1990 (Completed)
M-17-00--T9	COMPLETE CDR FOR 300 AREA PROCESS TRENCH (L-045H) (COMPLETE 6-7-90)	2/28/1990 (Completed)
M-17-00-T10	ESTABLISH SCHEDULE FOR 222-S LABORATORY AND CHEMICAL SEWER UPGRADES AND SUBMIT CHANGE PACKAGE TO ADD TARGET DATES	1/31/1990 (Completed)
M-17-00-T11	COMPLETE CONSTRUCTION OF LAUNDRY EFFLUENT 2724-W WASTEWATER TREATMENT PROJECT (B-697) (TO BE SUPERSEDED BY PROPOSED MILESTONE M-17-34B DUE 1/92).	5/31/1990 (Completed)
M-17-00-T12	COMPLETE DEFINITIVE DESIGN OF 200-E LAUNDRY PROJECT (B-503) (DELETED)	5/31/1991 (Deleted)
M-17-00-T13	COMPLETE CONSTRUCTION OF CHEMICAL SEWER NEUTRALIZATION SYSTEM AND DRAIN HEADER REROUTING FOR T-PLANT.	6/30/1991 (Completed)
M-17-00A	COMPLETE LIQUID EFFLUENT TREATMENT FAC./UPGRADES FOR ALL PHASE I STREAMS. HANFORD CURRENTLY HAS 19 PHASE I LIQUID EFFLUENT STREAMS BEING DISCHARGED TO CRIBS, PONDS, OR DITCHES. PHASE I STREAMS ARE DEFINED IN THE "ANNUAL STATUS REPORT OF THE PLAN AND SCHEDULE TO DISCONTINUE DISPOSAL	6/30/1995

Table D. Major and Interim Milestones

Number	Milestone	Due Date
M-17-00B	<p>OF CONTAMINATED LIQUIDS INTO THE SOIL COLUMN AT THE HANFORD SITE", SEPTEMBER 1988. SOME OF THE CRIBS, PONDS, OR DITCHES ARE RCRA WASTE DISPOSAL UNITS. THESE, ALONG WITH OTHERS, ARE LOCATED IN AREAS REQUIRING INACTIVE SITE INVESTIGATIONS/REMEDIAL ACTIONS. LIQUID EFFLUENT STREAMS ARE CLASSIFIED AS PHASE I STREAMS BASED UPON RADIONUCLIDE/CHEMICAL CONTENT, REGULATORY REQUIREMENTS RELATIVE TO THE WASTE DISPOSAL UNIT, CHEMICAL SPILL POTENTIAL, AND WASTE DISPOSAL UNIT LIFE EXPECTANCY. EACH OF THE PHASE I EFFLUENT STREAMS SHALL BE EITHER TREATED OR ELIMINATE, AS DEFINED IN THE ABOVE REFERENCED REPORT.</p> <p>INTERIM MILESTONES FOR PHASE I STREAMS INCLUDE THE DEVELOPMENT AND IMPLEMENTATION OF AN IMPACT ASSESSMENT METHODOLOGY, SAMPLING AND ANALYSIS PLANS, TREATMENT SYSTEM DESIGN AND CONSTRUCTION COMMITMENTS, INTERIM FLOW RESTRICTIONS AND DATES FOR CEASING DISCHARGE. SPECIFIC INTERIM/TARGET MILESTONE DATES FOR EACH STREAM AND ANY ASSOCIATED TREATMENT OR DISPOSAL FACILITIES ARE INCLUDED IN APPENDIX D WORK SCHEDULES.</p> <p>COMPLETE IMPLEMENTATION OF "BEST AVAILABLE TECHNOLOGY/ALL KNOWN, AVAILABLE, AND REASONABLE METHODS OF PREVENTION, CONTROL, AND TREATMENT (BAT/AKART) FOR ALL PHASE II LIQUID EFFLUENT STREAMS AT THE HANFORD SITE.</p> <p>HANFORD'S 14 PHASE II LIQUID EFFLUENT STREAMS ARE DISCHARGED TO CRIBS, PONDS, DITCHES, OR ROUTED TO STORAGE FACILITIES. PHASE II STREAMS ARE DEFINED IN THE "ANNUAL STATUS REPORT OF THE PLAN AND SCHEDULE TO DISCONTINUE DISPOSAL OF CONTAMINATED LIQUIDS INTO THE SOIL COLUMN AT THE HANFORD SITE", SEPTEMBER 1988. SOME OF THE CRIBS, PONDS, OR DITCHES ARE RCRA WASTE DISPOSAL UNITS. THESE, ALONG WITH OTHERS, ARE LOCATED IN AREAS REQUIRING INACTIVE SITE INVESTIGATIONS/REMEDIAL ACTIONS.</p> <p>ALL PHASE II EFFLUENT STREAMS, EXCEPT THOSE WHICH HAVE BEEN ELIMINATED (E.G., THE 209-E REFLECTOR WATER AND 163-N DEMINERALIZER LIQUID EFFLUENT), ARE MANAGED THROUGH A SEQUENCE OF INTERIM MILESTONES. INTERIM MILESTONES FOR PHASE II STREAMS INCLUDE THE DEVELOPMENT AND IMPLEMENTATION OF AN IMPACT ASSESSMENT METHODOLOGY, SAMPLING AND ANALYSIS PLANS, TREATMENT SYSTEM DESIGN AND CONSTRUCTION COMMITMENTS, INTERIM FLOW RESTRICTIONS AND DATES FOR CEASING DISCHARGE.</p> <p>SPECIFIC INTERIM/TARGET MILESTONE DATES FOR EACH STREAM AND ANY ASSOCIATED TREATMENT OR DISPOSAL FACILITIES ARE INCLUDED IN THE APPENDIX D WORK SCHEDULES.</p> <p>THE OCTOBER 1997 COMPLETION DATE FOR MILESTONE M-17-00B SHALL REMAIN UNCHANGED UNLESS ALL PARTIES AGREE THAT A CHANGE IS NECESSARY IN ACCORDANCE WITH ARTICLE XL OF THE TRI-PARTY AGREEMENT. THE PARTIES RECOGNIZE THAT THE MILESTONE MAY BE REVISED TO ACCELERATE OR DELAY</p>	10/31/1997

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Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
	IMPLEMENTATION OF BAT/AKART BASED ON THE RESULTS OF THE BAT/AKART EVALUATIONS FOR EACH OF THE NINE PHASE II LIQUID EFFLUENT STREAMS INCLUDED IN MILESTONE M-17-008. NEGOTIATIONS ON THE SCHEDULE FOR IMPLEMENTATION OF BAT/AKART AT EACH OF THE PHASE II LIQUID EFFLUENT STREAMS SHALL BE FINALIZED BY DECEMBER 1992. SUCH NEGOTIATIONS SHALL BE BASED ON THE BAT/AKART EVALUATIONS, THE COMPLEXITY OF THE REQUIRED TREATMENT AND ANY OTHER TECHNOLOGY NECESSARY TO MEET EFFLUENT GUIDELINES AND PERMITTING REQUIREMENTS SET FORTH BY ECOLOGY AND EPA. DOE WILL ASSURE ECOLOGY AND EPA OF MEANINGFUL AND FULLY FUNDED PARTICIPATION IN THE BAT/AKART DETERMINATION FOR EACH OF THE FOLLOWING PHASE II LIQUID EFFLUENTS: B-PLANT COOLING WATER AY/AZ TANK FARM STEAM CONDENSATE 242-A EVAPORATOR COOLING WATER 242-A EVAPORATOR STEAM CONDENSATE 241-A TANK FARM COOLING WATER 244-AR VAULT COOLING WATER 183-D FILTER BACKWASH 284-E POWER PLANT WASTEWATER 400 AREA SECONDARY COOLING WATER.	
M-17-01	COMPLETE B POND BY-PASS SYSTEM INSTALLATION (W-019). (COMPLETE 8-1-90)	10/31/1990 (Completed)
M-17-02	COMPLETE PUREX AMMONIA SCRUBBER DISTILLATE TREATMENT SYSTEM. (DELETED)	1/31/1995 (Deleted)
M-17-02--T1	COMPLETE DEFINITIVE DESIGN OF PUREX AMMONIA SCRUBBER DISTILLATE/PROCESS CONDENSATE TREATMENT SYSTEM. (DELETED)	12/31/1991 (Deleted)
M-17-03	COMPLETE PUREX DEMINERALIZER REGENERATION NEUTRALIZATION SYSTEM UPGRADES.	9/30/1989 (Completed)
M-17-04	CEASE DISCHARGE OF THE B PLANT CHEMICAL SEWER TO THE 216-B-3 POND SYSTEM NOTE: THIS EFFLUENT IS CONTAINED WITHIN THE SCOPE OF '200 AREA TREATED EFFLUENT DISPOSAL FACILITY' (PROJECT W-049H). SEE MILESTONE M-17-08.	6/30/1995
M-17-04--T1	COMPLETE CONSTRUCTION OF THE B PLANT CHEMICAL SEWER NEUTRALIZATION SYSTEM (W008)	9/30/1990 (Completed)
M-17-04--T2	COMPLETE DEFINITIVE DESIGN OF B PLANT ENVIRONMENTAL COMPLIANCE UPGRADE (W010)	12/31/1990 (Completed)
M-17-04--T3	COMPLETE DEFINITIVE DESIGN OF B PLANT AMU AREA UPGRADE (W004)	9/30/1990 (Completed)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-17-04--T5	COMPLETE CONSTRUCTION OF AMU AREA UPGRADE.	9/30/1991 (Completed)
M-17-04A	SUBMIT THE SAMPLING AND ANALYSIS PLAN FOR THE B PLANT CHEMICAL SEWER TO THE EPA AND ECOLOGY AS A PRIMARY DOCUMENT.	1/31/1992 (Completed)
M-17-04B	DISCONTINUE THE DISCHARGE OF THE B PLANT CHEMICAL SEWER TO THE 216-B-63 DITCH. REROUTE THIS EFFLUENT TO THE 216-B-3 POND SYSTEM VIA THE B PLANT COOLING WATER.	2/28/1992 (Completed)
M-17-04C	COMPLETE CONSTRUCTION OF PROJECT W-004, 'B-PLANT AQUEOUS MAKE-UP UNIT AREA UPGRADES' (PROJECT W004). NO CHEMICAL INVENTORY WILL BE STORED IN THE B PLANT AMU TANKS UNTIL PROJECT COMPLETION. THE CHEMICAL ADDITION LINES TO THESE TANKS WILL BE BLANKED OFF, EFFECTIVE SEPTEMBER 1991, AND WILL REMAIN SO UNTIL INITIATION OF ACCEPTANCE TESTING.	7/31/1992 (Completed)
M-17-04D	COMPLETE CONSTRUCTION OF PROJECT W-010H, B PLANT ENVIRONMENTAL COMPLIANCE UPGRADES.	7/31/1992 (Completed)
M-17-05	SELECT 300 AREA PROCESS TRENCH EFFLUENT TREATMENT OPTION AND ESTABLISH SCHEDULE FOR IMPLEMENTING TREATMENT AND CEASING LIQUID DISCHARGES.	3/31/1990 (Completed)
M-17-06	CEASE ALL DISCHARGES TO 300 AREA PROCESS TRENCHES. (DELETED)	12/31/1991 (Deleted)
M-17-06A	LIMIT DISCHARGE TO THE 300 AREA PROCESS TRENCHES TO LESS THAN OR EQUAL TO 400 GALLONS PER MINUTE (GPM) AVERAGED OVER THE CALENDAR MONTH.	12/31/1991 (Completed)
M-17-06B	SUBMIT THE 300 AREA PROCESS SEWER EFFLUENT CHARACTERIZATION REPORT BASED ON THE OCTOBER 1991 SAMPLING TO EPA AND ECOLOGY.	3/31/1992 (Completed)
M-17-06C	PROVIDE A SHUT-DOWN PLAN TO EPA AND ECOLOGY FOR THE 300 AREA PROCESS TRENCHES. THIS SHUT-DOWN PLAN SHALL ALLOW FOR THE SAFE, EXPEDITIOUS, AND ORDERLY SHUT-DOWN OF EFFLUENTS TO THE 300 AREA PROCESS TRENCHES, THIS PLAN SHALL IDENTIFY IMPACTS OF THE SHUT-DOWN ON AGREEMENT ACTIVITIES.	4/30/1992 (Completed)
M-17-06D	SUBMIT TO EPA AND ECOLOGY THE FINAL REPORT DETAILING THE RESULTS OF THE 300 AREA PROCESS TRENCH EXPEDITED RESPONSE ACTION (316-5 TRENCHES).	7/31/1992 (Completed)
M-17-06E	SUBMIT TO EPA AND ECOLOGY AN UPDATED ASSESSMENT OF POTENTIAL ENVIRONMENTAL IMPACTS FROM CONTINUED DISCHARGE TO THE 300 AREA PROCESS TRENCHES AT HANFORD, TO BE BASED ON ALL AVAILABLE INFORMATION. THIS INFORMATION SHALL INCLUDE BUT NOT BE LIMITED TO THE	7/31/1992 (Completed)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
	CHARACTERIZATION OF THE EFFLUENT AND THE RESULTS OF THE 300 AREA PROCESS TRENCH EXPEDITED RESPONSE ACTION.	
M-17-06F	CEASE DISCHARGE OF THE 300 AREA PROCESS SEWER TO THE WESTERN-MOST OF THE 300 AREA PROCESS TRENCHES (I.E., WEST PROCESS TRENCH) BY DECEMBER 1992.	12/31/1992 (Completed)
M-17-06G	LIMIT DISCHARGES TO THE 300 AREA PROCESS TRENCH TO LESS THAN OR EQUAL TO 325 GALLONS PER MINUTE, AVERAGED OVER THE CALENDAR MONTH BY MAY 1993.	5/31/1993 (Completed)
M-17-06H	COMPLETE INSTALLATION OF THE 384 POWER HOUSE BUILDING COOLING TOWER EQUIPMENT BY SEPTEMBER 1993.	9/30/1993 (Completed)
M-17-06I	COMPLETE CLOSED LOOP COOLING FOR SELECTED EQUIPMENT IN THE 325 BUILDING (AS PROVIDED BY PROJECT D-402), 306-W BUILDING (AS PROVIDED BY SMALL PROJECT ER 4039), AND THE 326 BUILDING (AS PROVIDED BY PROJECT D-403) BY DECEMBER 1993.	12/31/1993 (Completed)
M-17-06J	SUBMIT DESIGN DOCUMENTATION FOR THE 300 AREA PROCESS SEWER PIPING REPLACEMENT TO EPA AND ECOLOGY BY APRIL 1995.	4/30/1995
M-17-06K	REPLACE THE 300 AREA PROCESS SEWER PIPING BEGINNING AT FIVE FEET OUTSIDE THE CONTRIBUTOR BUILDINGS AND REPLACING THE PIPING UP TO THE INTERFACE POINT INTO THE 300 AREA TREATED EFFLUENT DISPOSAL FACILITY BY JUNE 1997.	6/30/1997
M-17-07	COMPLETE SECONDARY WASTE TREATMENT SYSTEM.(DELETED)	6/30/1995 (Deleted)
M-17-08	INITIATE FULL SCALE HOT OPERATIONS FOR '200 AREA TREATED EFFLUENT DISPOSAL FACILITY' (PROJECT W-049H), WITH PERMITTED DISPOSAL OF EFFLUENT TO EITHER THE SOIL COLUMN OR SURFACE WATER.	6/30/1995
M-17-08--T1	COMPLETE CDR FOR 200 AREA SYSTEM TREATED EFFLUENT DISPOSAL (W-049H) (COMPLETE 6-7-90)	4/30/1990 (Completed)
M-17-08A	SUBMIT '200 AREA TREATED EFFLUENT DISPOSAL FACILITY' (PROJECT W-049H) DESIGN-CONSTRUCTION SCHEDULE TO THE EPA AND ECOLOGY AS A PRIMARY DOCUMENT.	2/28/1992 (Completed)
M-17-08B	IMPLEMENT BAT/AKART AT THE GENERATING FACILITIES WHICH WILL DISCHARGE TO 200 AREA TREATED EFFLUENT DISPOSAL FACILITY (PROJECT W-049H). THOSE EFFLUENTS INCLUDED IN THE PROJECT SCOPE INCLUDE: PLUTONIUM FINISHING PLANT WASTEWATER 242-S EVAPORATOR STEAM CONDENSATE 2101-M LABORATORY WASTEWATER 284-W POWERPLANT WASTEWATER	6/30/1995

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
	T-PLANT LABORATORY WASTEWATER T-PLANT WASTEWATER 222-S LABORATORY WASTEWATER PUREX CHEMICAL SEWER - PUREX STEAM CONDENSATE - PUREX COOLING WATER UO3/U PLANT WASTEWATER UO3 PLANT PROCESS CONDENSATE B PLANT STEAM CONDENSATE B PLANT PROCESS CONDENSATE B PLANT CHEMICAL SEWER 200E LAUNDRY (NEW STREAM).	
M-17-09	INITIATE FULL SCALE HOT OPERATIONS OF THE '300 AREA TREATED EFFLUENT DISPOSAL FACILITY' (PROJECT L-045H), WITH PERMITTED DISPOSAL OF TREATED EFFLUENT TO SURFACE WATER.	12/31/1994
M-17-09--T1	COMPLETE CDR FOR 300 AREA SYSTEM TREATED EFFLUENT DISPOSAL (L-045H) (COMPLETE 6-7-90)	4/30/1990 (Completed)
M-17-09A	COMPLETE DEFINITIVE DESIGN OF '300 AREA TREATED EFFLUENT DISPOSAL FACILITY' (PROJECT L-045H) AND SUBMIT DESIGN DOCUMENTATION TO THE EPA AND ECOLOGY AS A PRIMARY DOCUMENT.	7/31/1993 (Completed)
M-17-10	CEASE ALL LIQUID DISCHARGES TO HAZARDOUS WASTE LAND DISPOSAL UNITS UNLESS SUCH UNITS HAVE BEEN CLEAN CLOSED IN ACCORDANCE WITH RCRA.	6/30/1995
M-17-11A	DEVELOP PLAN TO REROUTE 1325-N INFLUENTS (N REACTOR). (COMPLETED 1/31/92) (DELETED)	1/31/1992 (Deleted)
M-17-11B	IMPLEMENT PFP CLOSED LOOP COOLING. (DELETED)	1/31/1994 (Deleted)
M-17-11C	PROVIDE CURRENT INVENTORY ESTIMATE OF TRANSURANICS IN 216-Z-20 CRIB. (COMPLETED 7/31/91) (DELETED)	7/31/1991 (Deleted)
M-17-11D	COMPLETE STUDY TO EVALUATE THE NEED FOR ACCELERATING TREATMENT OF TRANSURANICS. (COMPLETED 7-31-91) (DELETED)	7/31/1991 (Deleted)
M-17-11E	ENGINEERING STUDY TO EVALUATE OPTIONS FOR TREATMENT AND/OR REROUTING OF SUSPECTED MAJOR CONTRIBUTORS OF TRANSURANICS (ONLY IF M-17-11D STUDY SHOWS ADDITIONAL PFP WASTEWATER TREATMENT IS WARRANTED). (COMPLETED 9/30/91) (DELETED)	4/30/1992 (Deleted)
M-17-11F	CEASE DISCHARGE TO EXISTING SITE (PFP - 216-Z-20 CRIB) SOIL COLUMN WHEN TREATMENT IMPLEMENTED BY JUNE 1995. (DELETED)	6/30/1995 (Deleted)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-17-11G	CEASE DISCHARGE TO EXISTING SITE (UO3/U PLANT - 216-U-14 DITCH) SOIL COLUMN WHEN 200 AREA TREATMENT FACILITY IS COMPLETED IN JUNE 1995. (DELETED)	6/30/1995 (Deleted)
M-17-11H	CEASE DISCHARGE TO EXISTING SITE (UO3 PLANT - 216-U-17 CRIB) SOIL COLUMN WHEN 200 AREA TREATMENT FACILITY IS COMPLETED IN JUNE 1995. (DELETED)	6/30/1995 (Deleted)
M-17-11I	IMPLEMENT FLOW RESTRICTIONS TO MAINTAIN 800 GPM TO 216-U-14 DITCH (COMPLETE 12/31/91) (DELETED)	12/31/1991 (Deleted)
M-17-11J	IMPLEMENT FLOW RESTRICTIONS TO MAINTAIN 300 GPM TO 216-U-14 DITCH. (DELETED)	12/31/1992 (Deleted)
M-17-11K	UO3/U PLANT WASTEWATER REROUTING EVALUATION STUDY. (COMPLETE 6/01/92) (DELETED)	5/31/1992 (Deleted)
M-17-11L	INSTALL FIBERMIST ELIMINATOR (UO3). LIMIT UO3 PLANT PROCESS CONDENSATE TO 10 GPM PRIOR TO AND DURING STABILIZATION RUN. (COMPLETE 1/31/92) (DELETED)	12/31/1991 (Deleted)
M-17-11M	COMPLETE STUDY EVALUATING NEED FOR POST NEUTRALIZATION FILTRATION FOR REMOVAL OF URANIUM FROM UO3 PLANT PROCESS CONDENSATE. (COMPLETE 8/30/92) (DELETED)	8/31/1991 (Deleted)
M-17-11N	REROUTE PUREX STEAM CONDENSATE TO PUREX PLANT CHEMICAL SEWER. (COMPLETE 6/30/92) (DELETED)	6/30/1992 (Deleted)
M-17-11O	REROUTE PUREX PLANT COOLING WATER TO THE PUREX PLANT CHEMICAL SEWER. (COMPLETED 6/30/92) (DELETED)	6/30/1992 (Deleted)
M-17-11P	ACCEPT REROUTED FLOW FOR PUREX PLANT STEAM CONDENSATE AND PUREX PLANT COOLING WATER TO CHEM SEWER DISCHARGE. (LIMIT 500 GPM) (COMPLETE 6/30/92) (DELETED)	6/30/1992 (Deleted)
M-17-12A	PROVIDE TO EPA & ECOLOGY SAMPLING AND ANALYSIS PLANS FOR PFP WASTEWATER, UO3 PLANT WASTEWATER, UO3 PLANT PROCESS CONDENSATE, 242-S EVAPORATOR STEAM CONDENSATE. (COMPLETE 9/30/91) (DELETED)	9/30/1991 (Deleted)
M-17-12A-T1	PROVIDE TO EPA & ECOLOGY SAMPLING AND ANALYSIS PLANS FOR PFP WASTEWATER. (COMPLETE 9/30/91) (DELETED)	9/30/1991 (Deleted)
M-17-12A-T2	PROVIDE TO EPA & ECOLOGY SAMPLING AND ANALYSIS PLANS FOR UO3/U PLANT WASTEWATER. (COMPLETE 9/30/91) (DELETED)	9/30/1991 (Deleted)
M-17-12A-T3	PROVIDE TO EPA & ECOLOGY SAMPLING AND ANALYSIS PLANS FOR UO3 PLANT PROCESS CONDENSATE. (COMPLETE 9/30/91) (DELETED)	9/30/1991 (Deleted)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-17-12A-T4	PROVIDE TO EPA & ECOLOGY SAMPLING AND ANALYSIS PLANS FOR 242-S EVAPORATOR STEAM CONDENSATE (FOR UO3 PLANT RESTART). (COMPLETE 9/30/91) (DELETED)	9/30/1991 (Deleted)
M-17-12B	PROVIDE TO EPA & ECOLOGY SAMPLING AND ANALYSIS PLANS FOR N REACTOR, PUREX PLANT CHEMICAL SEWER, AND 300 AREA PROCESS WASTEWATER. (COMPLETE 9/30/91) (DELETED)	9/30/1991 (Deleted)
M-17-12B-T1	PROVIDE TO EPA & ECOLOGY SAMPLING AND ANALYSIS PLANS FOR N REACTOR EFFLUENT. (COMPLETE 9/30/91) (DELETED)	9/30/1991 (Deleted)
M-17-12B-T2	PROVIDE TO EPA & ECOLOGY SAMPLING AND ANALYSIS PLANS FOR PUREX PLANT CHEMICAL SEWER. (COMPLETE 9/30/91) (DELETED)	9/30/1991 (Deleted)
M-17-12B-T3	PROVIDE TO EPA & ECOLOGY SAMPLING AND ANALYSIS PLANS FOR 300 AREA PROCESS WASTEWATER. (COMPLETE 9/30/91) (DELETED)	9/30/1991 (Deleted)
M-17-12C	PROVIDE TO EPA AND ECOLOGY SAMPLING AND ANALYSIS PLANS FOR S-PLANT WASTEWATER, 222-S LAB WASTEWATER, T-PLANT WASTEWATER, B PLANT CHEMICAL SEWER, 2101-M LAB WASTEWATER, AND 2724-W LAUNDRY WASTEWATER. COMPLETE 1/30/91) (DELETED)	1/31/1992 (Deleted)
M-17-12C-T1	PROVIDE TO EPA AND ECOLOGY SAMPLING AND ANALYSIS PLANS FOR S-PLANT WASTEWATER (REASSIGNED TO PROPOSED MILESTONE M-17-40) (COMPLETE 1/30/91) (DELETED)	1/31/1992 (Deleted)
M-17-12C-T2	PROVIDE TO EPA AND ECOLOGY SAMPLING AND ANALYSIS PLANS FOR 222-S LABORATORY WASTEWATER (REASSIGNED TO PROPOSED MILESTONE M-17-39A). (COMPLETE 1/30/91) (DELETED)	1/31/1992 (Deleted)
M-17-12C-T3	PROVIDE TO EPA AND ECOLOGY SAMPLING AND ANALYSIS PLANS FOR T-PLANT WASTEWATER (REASSIGNED TO PROPOSED MILESTONE M-17-41A). (COMPLETE 1/30/91) (DELETED)	1/31/1992 (Deleted)
M-17-12C-T4	PROVIDE TO EPA AND ECOLOGY SAMPLING AND ANALYSIS PLANS FOR B PLANT CHEMICAL SEWER (REASSIGNED TO PROPOSED MILESTONE M-17-04A). (COMPLETE 1/30/91) (DELETED)	1/31/1992 (Deleted)
M-17-12C-T5	PROVIDE TO EPA AND ECOLOGY SAMPLING AND ANALYSIS PLANS FOR 2101-M LABORATORY WASTEWATER (REASSIGNED TO PROPOSED MILESTONE M-17-43B). (COMPLETE 1/30/92) (DELETED)	1/31/1992 (Deleted)
M-17-12C-T6	PROVIDE TO EPA AND ECOLOGY SAMPLING AND ANALYSIS PLANS FOR 2724-W LAUNDRY WASTEWATER (REASSIGNED TO PROPOSED MILESTONE M-17-34A). (COMPLETE 1/30/92) (DELETED)	1/31/1992 (Deleted)



Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-17-12D	PROVIDE TO EPA AND ECOLOGY SAMPLING AND ANALYSIS PLANS FOR 241-A TANK FARM C/W, 244-AR VAULT C/W, 242-A EVAPORATOR STEAM CONDENSATE, 242-A EVAPORATOR C/W, 284-E PP W/W, 284-W PP W/W, 183-D FILTER B/W W/W, 400 AREA SEC. C/W, T-PLANT LAB W/W, B PLANT C/W. (DELETED)	4/30/1992 (Deleted)
M-17-12DT01	PROVIDE TO EPA AND ECOLOGY SAMPLING AND ANALYSIS PLANS FOR 241-A TANK FARM COOLING WATER. (COMPLETE 4/30/92) (DELETED)	4/30/1992 (Deleted)
M-17-12DT02	PROVIDE TO EPA AND ECOLOGY SAMPLING AND ANALYSIS PLANS FOR 244-AR VAULT COOLING WATER (COMPLETE 4/30/92) (DELETED)	4/30/1992 (Deleted)
M-17-12DT03	PROVIDE TO EPA AND ECOLOGY SAMPLING AND ANALYSIS PLANS FOR 242-A EVAPORATOR STEAM CONDENSATE (COMPLETE 4/30/92) (DELETED)	4/30/1992 (Deleted)
M-17-12DT04	PROVIDE TO EPA AND ECOLOGY SAMPLING AND ANALYSIS PLANS FOR 242-A EVAPORATOR COOLING WATER (COMPLETE 4/30/92) (DELETED)	4/30/1992 (Deleted)
M-17-12DT05	PROVIDE TO EPA AND ECOLOGY SAMPLING AND ANALYSIS PLANS FOR B PLANT COOLING WATER (COMPLETE 4/30/92) (DELETED)	4/30/1992 (Deleted)
M-17-12DT06	PROVIDE TO EPA AND ECOLOGY SAMPLING AND ANALYSIS PLANS FOR 284-W POWER PLANT WASTEWATER (COMPLETE 4/30/92) (DELETED)	4/30/1992 (Deleted)
M-17-12DT07	PROVIDE TO EPA AND ECOLOGY SAMPLING AND ANALYSIS PLANS FOR 284-E POWER PLANT WASTEWATER (COMPLETE 4/30/92) (DELETED)	4/30/1992 (Deleted)
M-17-12DT08	PROVIDE TO EPA AND ECOLOGY SAMPLING AND ANALYSIS PLANS FOR 183-D FILTER BACKWASH WASTEWATER (COMPLETE 4/30/92) (DELETED)	4/30/1992 (Deleted)
M-17-12DT09	PROVIDE TO EPA AND ECOLOGY SAMPLING AND ANALYSIS PLANS FOR 400 AREA SECONDARY COOLING WATER (COMPLETE 4/30/92) (DELETED)	4/30/1992 (Deleted)
M-17-12DT10	PROVIDE TO EPA AND ECOLOGY SAMPLING AND ANALYSIS PLANS FOR T-PLANT LABORATORY WASTEWATER (COMPLETE 4/30/92) (DELETED)	4/30/1992 (Deleted)
M-17-12E	SAP FOR REROUTE OF PUREX STEAM CONDENSATE AND PUREX COOLING WATER STREAMS TO THE PUREX PLANT CHEMICAL SEWER. THIS SAMPLING AND ANALYSIS PLAN TO BE DEVELOPED IN CONJUNCTION WITH THE PUREX PLANT CHEMICAL SEWER SAMPLING AND ANALYSIS PLAN.	9/30/1991 (Deleted)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-17-13	SUBMIT METHODOLOGY FOR ASSESSING IMPACT OF LIQUID DISCHARGE ON GROUNDWATER AT DISPOSAL SITES TO EPA AND ECOLOGY AS A PRIMARY DOCUMENT.	10/31/1991 (Completed)
M-17-13A	SUBMIT A SCHEDULE, AS A PRIMARY DOCUMENT, FOR IMPLEMENTATION OF THE IMPACT ASSESSMENT METHODOLOGY, INCLUDING BUT NOT LIMITED TO SITES LISTED BELOW. AN ASSESSMENT WILL NOT BE REQUIRED IF ALL DISPOSAL TO THE RECEIVING SITE HAS BEEN CEASED 1325-N LIQUID WASTE DISPOSAL FACILITY 216-Z-20 CRIB 216-U-14 DITCH 216-U-17 CRIB 216-B-3 POND SYSTEM 216-S-26 CRIB 216-T-4-2 DITCH 216-T-1 DITCH 284W POWERHOUSE POND 2101-M POND 216-W-LWC CRIB D POND 216-B-63 DITCH 400 AREA POND.	8/20/1992 (Completed)
M-17-14	INITIATE FULL SCALE HOT OPERATIONS FOR PROJECT C-018H, '242-A EVAPORATOR/PUREX PLANT PROCESS CONDENSATE TREATMENT FACILITY,' WITH PERMITTED DISCHARGE OF TREATED EFFLUENT TO THE SOIL COLUMN.	6/30/1995
M-17-14A	SUBMIT THE ARCHITECT/ENGINEERING FIRM DESIGN-CONSTRUCTION SCHEDULE FOR '242-A EVAPORATOR/PUREX PLANT CONDENSATE TREATMENT FACILITY' (PROJECT C-018H) TO THE EPA AND ECOLOGY.	2/28/1992 (Completed)
M-17-14B	INITIATE PILOT PLANT TESTING FOR 242-A EVAPORATOR/PUREX PLANT CONDENSATE TREATMENT FACILITY (PROJECT C-018H) AFTER THE EFFECTIVE DATE OF THE RD&D PERMIT. THIS TESTING WILL INCORPORATE THE USE OF ACTUAL EVAPORATOR PROCESS CONDENSATE AS IT IS AVAILABLE.	6/30/1992 (Deleted)
M-17-14C	SUBMIT FEDERAL DELISTING PETITION FOR TREATED EFFLUENT FROM INITIAL SUBMITTAL OF '242-A EVAPORATOR/PUREX PLANT CONDENSATE TREATMENT FACILITY' (PROJECT C-018H) IN ACCORDANCE WITH 40 CFR 260.22 TO THE EPA. (INITIAL SUBMITTAL)	10/31/1992 (Completed)
M-17-14D	INITIATE TEST PROCEDURES FOR THE 242-A EVAPORATOR/PUREX PLANT CONDENSATE TREATMENT FACILITY (PROJECT C-018H) USING SIMULANTS AND/OR ACTUAL LERF-STORED WASTES, WITH RECYCLE TO THE LERF BASINS.	6/30/1994
M-17-15	CEASE DISCHARGE TO THE 1325-N LIQUID WASTE DISPOSAL FACILITY (LWDF) SYSTEM.	6/30/1995 (Completed)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-17-15A	LIMIT DISCHARGES TO THE LWDF TO LESS THAN OR EQUAL TO 2 GALLONS PER MINUTE, AVERAGED OVER THE CALENDAR MONTH. THE TOTAL VOLUME OF WASTEWATER TO BE DISCHARGED TO THE LWDF FROM JUNE 1992 TO JUNE 1995 SHALL NOT EXCEED 1.8 MILLION GALLONS. DISCHARGE FLOW RATE SHALL NOT EXCEED 1.8 MILLION GALLONS. DISCHARGE FLOW RATE SHALL BE DETERMINED BY MEASURING THE SUMPS BEFORE AND AFTER PUMPING OR THROUGH MONITORING AT THE DISCHARGE TO THE 1325-N LWDF.	9/30/1991 (Completed)
M-17-15B	SUBMIT THE N REACTOR EFFLUENT BAT/AKART EVALUATION TO THE EPA AND ECOLOGY.	1/31/1992 (Completed)
M-17-15C	SUBMIT A PLAN TO CEASE DISCHARGE OF ALL LIQUID EFFLUENTS TO THE 1325-N LWDF TO EPA AND ECOLOGY. THIS PLAN SHALL BE BASED ON THE IMPLEMENTATION OF BAT/AKART. (REASSIGNED FROM M-17-11A).	1/31/1992 (Completed)
M-17-15D	SUBMIT TO EPA AND ECOLOGY AN NPDES PERMIT MODIFICATION REQUEST FOR THE N REACTOR EFFLUENT.	6/30/1992 (Completed)
M-17-16	CEASE ALL DISCHARGES TO THE 216-Z-20 CRIB. NOTE: THIS EFFLUENT IS CONTAINED WITHIN THE SCOPE OF '200 AREA TREATED EFFLUENT DISPOSAL FACILITY' (PROJECT W-049H). SEE MILESTONE M-17-08	6/30/1995
M-17-16A	LIMIT DISCHARGE OF THE PFP WASTEWATER TO THE 216-Z-20 CRIB TO LESS THAN OR EQUAL TO 100 GALLONS PER MINUTE, AVERAGED OVER THE CALENDAR MONTH.	9/30/1991 (Completed)
M-17-16B	INSTALL A FLUME FOR THE PFP WASTEWATER FOR THE PURPOSES OF FLOW RATE MEASUREMENT. THEREAFTER THE FLOW RATE SHALL BE MEASURED BY THE FLUME AND AUTOMATICALLY RECORDED ON A STRIP CHART RECORDER.	12/31/1991 (Completed)
M-17-16C	COMPLETE DEFINITIVE DESIGN OF THE 'PFP LIQUID LOW-LEVEL WASTE SYSTEM MODIFICATION' (PROJECT B-680H) AND SUBMIT DESIGN DOCUMENTATION TO THE EPA AND ECOLOGY AS A PRIMARY DOCUMENT.	12/31/1992 (Completed)
M-17-16D	IMPLEMENT CLOSED LOOP COOLING FOR BUILDINGS 291-Z, 234-5Z, AND 236-Z, AS PROVIDED BY '291-Z CLOSED LOOP COOLING' (PROJECT C-040) AND 'PLUTONIUM FINISHING PLAN LIQUID LOW-LEVEL WASTE SYSTEM MODIFICATION (PROJECT B-680H). REDUCE THE DISCHARGE TO THE 216-Z-20 CRIB TO LESS THAN OR EQUAL TO 75 GALLONS PER MINUTE, AVERAGED OVER THE CALENDAR MONTH.	1/31/1994 (Completed)
M-17-16E	COMPLETE 'PLUTONIUM FINISHING PLANT LIQUID LOW LEVEL WASTE SYSTEM MODIFICATION' (PROJECT B-680H).	5/31/1994
M-17-17	CEASE DISCHARGE OF THE UO3/U PLANT WASTEWATER TO THE 216-U-14 DITCH. (REASSIGNED FROM M-17-11G)	6/30/1995

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-17-17A	<p>EXCEPT AS SPECIFIED BELOW, LIMIT DISCHARGE OF THE WASTEWATER TO THE DITCH TO LESS THAN OR EQUAL TO 450 GALLONS PER MINUTE, AVERAGED OVER THE CALENDAR MONTH. DURING STABILIZATION RUN, LIMIT THE DISCHARGE OF WASTEWATER TO THE DITCH TO LESS THAN OR EQUAL TO 750 GALLONS PER MINUTE, AVERAGED OVER THE CALENDAR MONTH. MEASUREMENT OF THE DISCHARGE FLOW RATE SHALL BE BY A FLOW MEASUREMENT SYSTEM WHICH PROVIDES INSTANTANEOUS FLOW RATE RECORDING AND A FLOW TOTALIZER.</p> <p>NOTE: THE STABILIZATION RUN OF THE UO3/U PLANT REFERS TO THE OPERATION OF THE PLANT IN THE CALCINATION MODE AS DESCRIBED IN THE UO3/U PLANT WASTEWATER STREAM SPECIFIC REPORT. THE STABILIZATION RUN WILL OCCUR OVER A SHORT PERIOD OF TIME AND IS NECESSARY TO CONVERT PLANT INVENTORY TO A MORE STABLE FORM FOR STORAGE.</p>	9/30/1991 (Completed)
M-17-17B	<p>CEASE DISCHARGE OF THE 216-U-14 DITCH SURFACE CONTAMINATION CONTROL WATER. LIMIT THE 216-U-14 DITCH CONTAMINATION CONTROL WATER POINT SOURCE DISCHARGE AT LESS THAN OR EQUAL TO 300 GALLONS PER MINUTE, AS ESTIMATED THROUGH ENGINEERING CALCULATIONS, UNTIL COMPLETION OF THE STABILIZATION RUN. AT THE COMPLETION OF THE STABILIZATION RUN, CEASE THE EXISTING CONTAMINATION CONTROL WATER POINT SOURCE DISCHARGE AND INITIATE CONSTRUCTION OF THE ENGINEERED SURFACE CONTAMINATION CONTROL SOLUTION. THE USE OF CLEAN WATER DURING CONSTRUCTION IS ALLOWED FOR DUST CONTROL. THIS DUST CONTROL WATER SHALL NOT EXCEED 300 GPM AND MUST BE DISCONTINUED BY FEBRUARY 1992.</p>	2/28/1992 (Completed)
M-17-17C	<p>COMPLETE A STUDY WHICH EVALUATES THE NEED FOR AND FEASIBILITY OF REROUTING THE UO3/U PLANT WASTEWATER TO AN ALTERNATIVE SITE AND SUBMIT STUDY TO THE EPA AND ECOLOGY.</p>	5/31/1992 (Completed)
M-17-17D	<p>EXCEPT AS SPECIFIED BELOW, LIMIT DISCHARGE OF THE UO3/U PLANT WASTEWATER TO THE 216-U-14 DITCH TO LESS THAN OR EQUAL TO 250 GALLONS PER MINUTE, AVERAGED OVER THE CALENDAR MONTH. DURING PRE-CAMPAIGN PROCESSING, LIMIT DISCHARGE OF THE WASTEWATER TO THE DITCH TO LESS THAN OR EQUAL TO 450 GALLONS PER MINUTE AVERAGED OVER THE CALENDAR MONTH. DURING THE STABILIZATION RUN, LIMIT THE DISCHARGE OF WASTEWATER TO THE DITCH TO LESS THAN OR EQUAL TO 750 GALLONS PER MINUTE, AVERAGED OVER THE CALENDAR MONTH. LIMIT THE FLOW RATE TO LESS THAN OR EQUAL TO 250 GALLONS PER MINUTE, AVERAGED OVER THE CALENDAR MONTH, BY THE END OF THE CALENDAR MONTH FOLLOWING THE STABILIZATION RUN COMPLETION. THE PRE-CAMPAIGN PROCESSING IS EXPECTED TO LAST APPROXIMATELY FOUR WEEKS, THE STABILIZATION RUN IS EXPECTED TO LAST APPROXIMATELY EIGHT WEEKS. EPA AND ECOLOGY WILL BE NOTIFIED IN WRITING AT LEAST FIVE WORKING DAYS PRIOR TO INITIATING THE FLOW RATE INCREASE TO 450 GPM.</p>	12/31/1992 (Completed)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-17-18	CEASE DISCHARGE OF THE 242-S EVAPORATOR STEAM CONDENSATE TO THE 216-U-14 DITCH. NOTE: THIS EFFLUENT IS CONTAINED WITHIN THE SCOPE OF '200 AREA TREATED EFFLUENT DISPOSAL FACILITY' (PROJECT W-049H). SEE MILESTONE M-17-08	6/30/1995
M-17-18A	LIMIT THE DISCHARGE OF STEAM CONDENSATE TO THE DITCH TO LESS THAN OR EQUAL TO 50 GALLONS PER MINUTE. THIS FLOW RATE IS CALCULATED BASED ON THE MAXIMUM DESIGN FLOW.	9/30/1991 (Completed)
M-17-18B	REPLACE THE AIR SAMPLE PUMP AT THE 242-S EVAPORATOR AND ELIMINATE THE SEAL WATER CONTRIBUTION TO THE 242-S EVAPORATOR STEAM CONDENSATE.	9/30/1992 (Completed)
M-17-19	CEASE DISCHARGE TO THE 216-U-17 CRIB. NOTE: THIS EFFLUENT IS CONTAINED WITHIN THE SCOPE OF "200 AREA TREATED EFFLUENT DISPOSAL FACILITY" (PROJECT W-049H). SEE MILESTONE M-17-08	6/30/1995
M-17-19A	LIMIT DISCHARGE OF THE UO3 PLANT PROCESS CONDENSATE TO THE 216-U-17 CRIB TO LESS THAN OR EQUAL TO 10 GALLONS PER MINUTE, AVERAGED OVER THE CALENDAR MONTH. THE VOLUME OF WASTEWATER TO BE DISCHARGED TO THE 216-U-17 CRIB FROM JUNE 1992 TO JUNE 1995 SHALL NOT EXCEED 2 MILLION GALLONS. OPERATE & TEST THE EFFICIENCY OF THE FIBERMIST ELIMINATOR THROUGHOUT THE DURATION OF THE UO3/U PLANT STABILIZATION RUN. DISCHARGE OF THE UO3 PROCESS CONDENSATE SHALL BE FURTHER LIMITED AFTER THE STABILIZATION RUN TO LESS THAN OR EQUAL TO 2 GALLONS PER MINUTE, AVERAGED OVER THE CALENDAR MONTH. DISCHARGE FLOW RATE SHALL BE CALCULATED BASED ON A BATCH COUNTER. NOTE: THE STABILIZATION RUN OF THE UO3/U PLANT REFERS TO THE OPERATION OF THE PLANT IN THE CALCINATION MODE AS DESCRIBED IN THE UO3 PLANT PROCESS CONDENSATE STREAM SPECIFIC REPORT. THE STABILIZATION RUN WILL OCCUR OVER A SHORT PERIOD OF TIME AND IS NECESSARY TO CONVERT PLANT INVENTORY TO A MORE STABLE FORM FOR STORAGE.	9/30/1991 (Completed)
M-17-20	IMPLEMENT BAT/AKART FOR THE PUREX PLANT PROCESS CONDENSATE. NO SOIL COLUMN DISPOSAL OF THIS EFFLUENT WILL OCCUR UNTIL BAT/AKART IS IMPLEMENTED AS PART OF '242-A EVAPORATOR/PUREX PLANT CONDENSATE TREATMENT FACILITY' (PROJECT C-018H). SEE MILESTONE M-17-14	6/30/1995 (Completed)
M-17-20A	CEASE ALL DISCHARGE TO THE 216-A-45 CRIB.	9/30/1991 (Completed)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-17-21	IMPLEMENT BAT/AKART FOR THE PUREX PLANT AMMONIA SCRUBBER CONDENSATE. NO SOIL COLUMN DISPOSAL OF THIS EFFLUENT WILL OCCUR UNTIL BAT/AKART IS IMPLEMENTED AS PART OF '242-A EVAPORATOR/ PUREX PLANT CONDENSATE TREATMENT FACILITY' (PROJECT C-018H). SEE MILESTONE M-17-14.	6/30/1995 (Completed)
M-17-21A	CEASE ALL DISCHARGE TO THE 216-A-36B CRIB.	9/30/1991 (Completed)
M-17-22	CEASE DISCHARGE OF THE PUREX PLANT STEAM CONDENSATE TO THE 216-B-3 POND SYSTEM. NOTE: THIS EFFLUENT IS CONTAINED WITHIN THE SCOPE OF '200 AREA TREATED EFFLUENT DISPOSAL FACILITY' (PROJECT W-049H). SEE MILESTONE M-17-08.	6/30/1995 (Completed)
M-17-22A	DISCONTINUE DISCHARGE OF THE PUREX PLANT STEAM CONDENSATE TO THE 216-A-30 AND 216-A-37-2 CRIBS. REROUTE EFFLUENT FLOW TO THE 216-B-3 POND SYSTEM VIA THE PUREX CHEMICAL SEWER. FOLLOWING IMPLEMENTATION OF BAT/AKART AND APPROVAL OF A SAMPLING AND ANALYSIS PLAN, DISCHARGE TO THE 216-A-30 AND 216-A-37-2 CRIBS MAY RESUME IF SUPPORTED BY THE ENVIRONMENTAL IMPACT ASSESSMENT AGREED TO BY EPA AND ECOLOGY. EFFECTIVE SEPTEMBER 1991, DISCHARGE TO THE 216-B-3 POND SYSTEM IS ALLOWED, AND MAY CONTINUE PROVIDED SUCH DISCHARGE IS CONSISTENT WITH THE CLOSURE SCHEDULE AND STRATEGY IN ANY ECOLOGY APPROVED 216-B-3 POND SYSTEM CLOSURE PLAN.	6/30/1992 (Completed)
M-17-23	CEASE DISCHARGE OF THE PUREX PLANT COOLING WATER TO THE 216-B-3 POND SYSTEM. NOTE: THIS EFFLUENT IS CONTAINED WITHIN THE SCOPE OF '200 AREA TREATED EFFLUENT DISPOSAL FACILITY' (PROJECT W-049H). SEE MILESTONE M-17-08.	6/30/1995 (Completed)
M-17-23A	REROUTE THE PUREX PLANT COOLING WATER EFFLUENT TO THE 216-B-3 POND SYSTEM VIA THE PUREX CHEMICAL SEWER. EFFECTIVE SEPTEMBER 1991, DISCHARGE TO THE 216-B-3 POND SYSTEM IS ALLOWED, AND MAY CONTINUE PROVIDED SUCH DISCHARGE IS CONSISTENT WITH THE CLOSURE SCHEDULE AND STRATEGY IN ANY ECOLOGY APPROVED 216-B-3 POND SYSTEM CLOSURE PLAN.	6/30/1992 (Completed)
M-17-24	CEASE DISCHARGE OF THE PUREX PLANT CHEMICAL SEWER TO THE 216-B-3 POND SYSTEM. NOTE: THIS EFFLUENT IS CONTAINED WITHIN THE SCOPE OF '200 AREA TREATED EFFLUENT DISPOSAL FACILITY' (PROJECT W-049H). SEE MILESTONE M-17-08.	6/30/1995
M-17-24A	COMPLETE PUREX RECONFIGURATION AND SOURCE CONTROL TO MINIMIZE VOLUME AND REROUTE THE REMAINING PUREX COOLING WATER AND STEAM CONDENSATE TO THE 216-B-3 POND SYSTEM VIA THE PUREX CHEMICAL SEWER. LIMIT THE DISCHARGE OF	6/30/1992 (Completed)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
	THE PUREX PLAN CHEMICAL SEWER TO THE 216-B-3 POND SYSTEM TO LESS THAN OR EQUAL TO 600 GALLONS PER MINUTE, AVERAGED OVER THE CALENDAR MONTH. MEASUREMENT OF THE DISCHARGE FLOW VOLUME SHALL BE BY A COMBINATION OF MAGNETIC AND PNEUMATIC FLOWMETERS WITH DATA RECORDING BY A STRIP CHART RECORDER. EFFECTIVE SEPTEMBER 1991, DISCHARGE TO THE 216-B-3 POND SYSTEM IS ALLOWED, AND MAY CONTINUE PROVIDED SUCH DISCHARGE IS CONSISTENT WITH THE CLOSURE SCHEDULE AND STRATEGY IN ANY ECOLOGY APPROVED 216-B-3 POND SYSTEM CLOSURE PLAN.	
M-17-25	CEASE ALL DISCHARGE TO THE 216-B-55 CRIB. THERE SHALL BE NO FURTHER SOIL COLUMN DISCHARGE OF B PLANT STEAM CONDENSATE UNTIL BAT/AKART IS IMPLEMENTED; UNTIL THAT TIME EFFLUENT WILL BE ROUTED TO DOUBLE SHELL TANKS. FOLLOWING IMPLEMENTATION OF BAT/AKART AND APPROVAL OF A SAMPLING AND ANALYSIS PLAN, DISCHARGE TO THE 216-B-55 CRIB MAY RESUME IF SUPPORTED BY THE ENVIRONMENTAL ASSESSMENT AGREED TO BY EPA AND ECOLOGY. NOTE: THIS EFFLUENT IS CONTAINED WITHIN THE SCOPE OF '200 AREA TREATED EFFLUENT DISPOSAL FACILITY' (PROJECT W-049H). SEE MILESTONE M-17-08.	9/30/1991 (Completed)
M-17-26	CEASE DISCHARGE TO THE 216-B-62 CRIB. THERE SHALL BE NO FURTHER SOIL COLUMN DISCHARGE OF B PLANT PROCESS CONDENSATE UNTIL BAT/AKART IS IMPLEMENTED; UNTIL THAT TIME, EFFLUENT WILL BE REROUTED TO DOUBLE SHELL TANKS. FOLLOWING IMPLEMENTATION OF BAT/AKART AND APPROVAL OF A SAMPLING AND ANALYSIS PLAN, DISCHARGE TO THE 216-B-62 CRIB MAY RESUME IF SUPPORTED BY THE ENVIRONMENTAL IMPACT ASSESSMENT AGREED TO BY EPA AND ECOLOGY. NOTE: THIS EFFLUENT IS CONTAINED WITHIN THE SCOPE OF '200 AREA TREATED EFFLUENT DISPOSAL FACILITY' (PROJECT W-049H). SEE MILESTONE M-17-08.	9/30/1991 (Completed)
M-17-27	SUBMIT THE SAMPLING AND ANALYSIS PLAN FOR THE B PLANT COOLING WATER TO THE EPA AND ECOLOGY AS A PRIMARY DOCUMENT.	4/30/1992 (Completed)
M-17-28	CEASE DISCHARGE TO THE 216-A-08 CRIB. THERE SHALL BE NO FURTHER SOIL COLUMN DISCHARGE OF THIS EFFLUENT UNTIL BAT/AKART IS IMPLEMENTED; IN THE INTERIM, THE EFFLUENT WILL BE ROUTED TO DOUBLE-SHELL TANKS. FOLLOWING IMPLEMENTATION OF BAT/AKART AND APPROVAL OF A SAMPLING AND ANALYSIS PLAN, DISCHARGE TO THE 216-A-08 CRIB MAY RESUME IF SUPPORTED BY THE ENVIRONMENTAL IMPACT ASSESSMENT AGREED TO BY EPA AND ECOLOGY.	9/30/1991 (Completed)
M-17-29	IMPLEMENT BAT/AKART FOR THE 242-A EVAPORATOR PROCESS CONDENSATE.	6/30/1995

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-17-29A	CEASE DISCHARGES TO THE 216-A-37-1 CRIB. NO SOIL COLUMN DISPOSAL OF THIS EFFLUENT SHALL OCCUR UNTIL BAT/AKART IS IMPLEMENTED AS PART OF '242-A EVAPORATOR/PUREX PLANT CONDENSATE TREATMENT FACILITY' (PROJECT C-018H). SEE MILESTONE M-17-14. UPON RESTART OF THE 242-A EVAPORATOR IN FISCAL YEAR 1992, PROCESS CONDENSATE WILL BE ROUTED TO THE LERF BASINS FOR STORAGE AND EVENTUAL PROCESSING VIA THE '242-A EVAPORATOR/PUREX PLANT CONDENSATE TREATMENT FACILITY' (PROJECT C-018H).	9/30/1991 (Completed)
M-17-30	SUBMIT THE SAMPLING AND ANALYSIS PLAN FOR THE 242-A EVAPORATOR COOLING WATER TO THE EPA AND ECOLOGY AS A PRIMARY DOCUMENT. EFFECTIVE SEPTEMBER 1991, DISCHARGE TO THE 216-B-3 POND SYSTEM IS ALLOWED, AND MAY CONTINUE PROVIDED SUCH DISCHARGE IS CONSISTENT WITH THE CLOSURE SCHEDULE AND STRATEGY IN ANY ECOLOGY APPROVED 216-B-3 POND SYSTEM CLOSURE PLAN.	4/30/1992 (Completed)
M-17-31	SUBMIT THE SAMPLING AND ANALYSIS PLAN FOR THE 242-A EVAPORATOR STEAM CONDENSATE TO THE EPA AND ECOLOGY AS A PRIMARY DOCUMENT. EFFECTIVE SEPTEMBER 1991, DISCHARGE TO THE 216-B-3 POND SYSTEM IS ALLOWED, AND MAY CONTINUE PROVIDED SUCH DISCHARGE IS CONSISTENT WITH THE CLOSURE SCHEDULE AND STRATEGY IN ANY ECOLOGY APPROVED 216-B-3 POND SYSTEM CLOSURE PLAN.	4/30/1992 (Completed)
M-17-32	COMPLETE TANK FARM VENTILATION UPGRADE (PROJECT W-030).	12/31/1996 (Deleted)
M-17-32A	SUBMIT SAMPLING AND ANALYSIS PLAN FOR THE 241-A TANK FARM COOLING WATER TO THE EPA AND ECOLOGY AS A PRIMARY DOCUMENT. EFFECTIVE SEPTEMBER 1991, DISCHARGE TO THE 216-B-3 POND SYSTEM IS ALLOWED, AND MAY CONTINUE PROVIDED SUCH DISCHARGE IS CONSISTENT WITH THE CLOSURE SCHEDULE AND STRATEGY IN ANY ECOLOGY APPROVED 216-B-3 POND SYSTEM CLOSURE PLAN.	4/30/1992 (Completed)
M-17-33	SUBMIT SAMPLING AND ANALYSIS PLAN FOR THE 244-AR VAULT COOLING WATER TO THE EPA AND ECOLOGY AS A PRIMARY DOCUMENT. EFFECTIVE SEPTEMBER 1991, DISCHARGE TO THE 216-B-3 POND SYSTEM IS ALLOWED, AND MAY CONTINUE PROVIDED SUCH DISCHARGE IS CONSISTENT WITH THE CLOSURE SCHEDULE AND STRATEGY IN ANY ECOLOGY APPROVED 216-B-3 POND SYSTEM CLOSURE PLAN.	4/30/1992 (Completed)
M-17-34	CEASE DISCHARGES TO THE 216-W-LWC CRIB.	1/31/1995
M-17-34A	SUBMIT THE SAMPLING AND ANALYSIS PLAN FOR THE 2724-W LAUNDRY WASTEWATER TO THE EPA AND ECOLOGY AS A PRIMARY DOCUMENT.	1/31/1992 (Completed)



Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-17-34B	COMPLETE CONSTRUCTION OF LAUNDRY EFFLUENT 2724-W WASTEWATER TREATMENT PROJECT (B-697).	1/31/1992 (Completed)
M-17-35	CEASE DISCHARGE OF THE 200-E DECONTAMINATION LAUNDRY FACILITY LIQUID EFFLUENT TO THE 216-B-3 POND SYSTEM. NOTE 1: THIS EFFLUENT IS CONTAINED WITHIN THE SCOPE OF '200 AREA TREATED EFFLUENT DISPOSAL FACILITY' (PROJECT W-049H). SEE MILESTONE M-17-08 NOTE 2: UPON WRITTEN NOTIFICATION BY USDOE TO ECOLOGY AND EPA THAT USDOE HAS MADE A DECISION TO OBTAIN FUTURE LAUNDRY SERVICES FROM AN OFFSITE COMMERCIAL SOURCE RATHER THAN THROUGH CONSTRUCTION AND OPERATION OF A NEW ONSITE LAUNDRY FACILITY, PERFORMANCE OF THE MILESTONES AND INTERIM RESTRICTIONS RELATED TO THE NEW DECONTAMINATION LAUNDRY FACILITY (PROJECT B-503) SHALL NO LONGER BE REQUIRED.	6/30/1995 (Deleted)
M-17-35A	COMPLETE DEFINITIVE DESIGN OF 'DECONTAMINATION LAUNDRY FACILITY' (PROJECT B-503) AND SUBMIT DESIGN DOCUMENTATION TO THE EPA AND ECOLOGY AS A PRIMARY DOCUMENT. NOTE: UPON WRITTEN NOTIFICATION BY USDOE TO ECOLOGY AND EPA THAT USDOE HAS MADE A DECISION TO OBTAIN FUTURE LAUNDRY SERVICES FROM AN OFFSITE COMMERCIAL SOURCE RATHER THAN THROUGH CONSTRUCTION AND OPERATION OF A NEW ONSITE LAUNDRY FACILITY, PERFORMANCE OF THE MILESTONES AND INTERIM RESTRICTIONS RELATED TO THE NEW DECONTAMINATION LAUNDRY FACILITY (PROJECT B-503) SHALL NO LONGER BE REQUIRED.	9/30/1992 (Deleted)
M-17-35B	SUBMIT THE CONSTRUCTION TEST PLAN FOR 'DECONTAMINATION LAUNDRY FACILITY' (PROJECT B-503) TO THE EPA AND ECOLOGY AS A PRIMARY DOCUMENT. NOTE: UPON WRITTEN NOTIFICATION BY USDOE TO ECOLOGY AND EPA THAT USDOE HAS MADE A DECISION TO OBTAIN FUTURE LAUNDRY SERVICES FROM AN OFFSITE COMMERCIAL SOURCE RATHER THAN THROUGH CONSTRUCTION AND OPERATION OF A NEW ONSITE LAUNDRY FACILITY, PERFORMANCE OF THE MILESTONES AND INTERIM RESTRICTIONS RELATED TO THE NEW DECONTAMINATION LAUNDRY FACILITY (PROJECT B-503) SHALL NO LONGER BE REQUIRED.	4/30/1993 (Deleted)
M-17-35C	COMPLETE CONSTRUCTION OF 'DECONTAMINATION LAUNDRY FACILITY' (PROJECT B-503) NOTE: UPON WRITTEN NOTIFICATION BY USDOE TO ECOLOGY AND EPA THAT USDOE HAS MADE A DECISION TO OBTAIN FUTURE LAUNDRY SERVICES FROM AN OFFSITE COMMERCIAL SOURCE RATHER THAN THROUGH CONSTRUCTION AND OPERATION OF A NEW ONSITE LAUNDRY FACILITY, PERFORMANCE OF THE MILESTONES AND INTERIM RESTRICTIONS RELATED TO THE NEW DECONTAMINATION LAUNDRY FACILITY (PROJECT B-503) SHALL NO LONGER BE REQUIRED.	10/31/1994 (Deleted)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-17-35D	INITIATE FULL-SCALE HOT OPERATIONS OF THE DECONTAMINATION LAUNDRY FACILITY WITH DISCHARGE TO BAT/AKART EFFLUENT TO THE 216-B-3 POND SYSTEM. NOTE: UPON WRITTEN NOTIFICATION BY USDOE TO ECOLOGY AND EPA THAT USDOE HAS MADE A DECISION TO OBTAIN FUTURE LAUNDRY SERVICES FROM AN OFFSITE COMMERCIAL SOURCE RATHER THAN THROUGH CONSTRUCTION AND OPERATION OF A NEW ONSITE LAUNDRY FACILITY, PERFORMANCE OF THE MILESTONES AND INTERIM RESTRICTIONS RELATED TO THE NEW DECONTAMINATION LAUNDRY FACILITY (PROJECT B-503) SHALL NO LONGER BE REQUIRED.	1/31/1995 (Deleted)
M-17-36	SUBMIT THE SAMPLING AND ANALYSIS PLAN FOR THE 183-D FILTER BACKWASH TO THE EPA AND ECOLOGY AS A PRIMARY DOCUMENT.	4/30/1992 (Completed)
M-17-37	SUBMIT SAMPLING AND ANALYSIS PLAN FOR THE 284-E POWERPLANT WASTEWATER TO THE EPA AND ECOLOGY AS A PRIMARY DOCUMENT. EFFECTIVE SEPTEMBER 1991, DISCHARGE TO THE 216-B-3 POND SYSTEM IS ALLOWED, AND MAY CONTINUE PROVIDED SUCH DISCHARGE IS CONSISTENT WITH THE CLOSURE SCHEDULE AND STRATEGY IN ANY ECOLOGY APPROVED 216-B-3 POND SYSTEM CLOSURE PLAN.	4/30/1992 (Completed)
M-17-38	CEASE ALL DISCHARGES TO THE 284-W POWERPLANT POND. NOTE: THIS EFFLUENT IS CONTAINED WITHIN THE SCOPE OF '200 AREA TREATED EFFLUENT DISPOSAL FACILITY' (PROJECT W-049H). SEE MILESTONE M-17-08.	6/30/1995
M-17-38A	SUBMIT THE SAMPLING AND ANALYSIS PLAN FOR THE 284-W POWERPLANT WASTEWATER TO THE EPA AND ECOLOGY AS A PRIMARY DOCUMENT.	4/30/1992 (Completed)
M-17-39	CEASE ALL DISCHARGES TO THE 216-S-26 CRIB. NOTE: THIS EFFLUENT IS CONTAINED WITHIN THE SCOPE OF '200 AREA TREATED EFFLUENT DISPOSAL FACILITY' (PROJECT W-049H). SEE MILESTONE M-17-08.	6/30/1995
M-17-39A	SUBMIT THE SAMPLING AND ANALYSIS PLAN FOR THE 222-S LABORATORY WASTEWATER TO THE EPA AND ECOLOGY AS A PRIMARY DOCUMENT.	1/31/1992 (Completed)
M-17-40	CEASE ALL DISCHARGES TO THE 216-S-10 DITCH.	10/31/1991 (Completed)
M-17-41	CEASE ALL DISCHARGE TO THE 216-T-4-2 DITCH. NOTE: THIS EFFLUENT IS CONTAINED WITHIN THE SCOPE OF '200 AREA TREATED EFFLUENT DISPOSAL FACILITY' (PROJECT W-049H). SEE MILESTONE M-17-08.	6/30/1995
M-17-41A	SUBMIT THE SAMPLING AND ANALYSIS PLAN FOR THE T PLANT WASTEWATER TO THE EPA AND ECOLOGY AS A PRIMARY DOCUMENT.	1/31/1992 (Completed)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-17-42	CEASE ALL DISCHARGES TO THE 216-T-1 DITCH. NOTE: THIS EFFLUENT IS CONTAINED WITHIN THE SCOPE OF '200 AREA TREATED EFFLUENT DISPOSAL FACILITY' (PROJECT W-049H). SEE MILESTONE M-17-08.	6/30/1995
M-17-42A	SUBMIT THE SAMPLING AND ANALYSIS PLAN FOR THE T-PLANT LABORATORY WASTEWATER TO THE EPA AND ECOLOGY AS A PRIMARY DOCUMENT.	4/30/1992 (Completed)
M-17-43	CEASE ALL DISCHARGES TO THE 2101-M POND. NOTE: THIS EFFLUENT IS CONTAINED WITH THE SCOPE OF '200 AREA TREATED EFFLUENT DISPOSAL FACILITY' (PROJECT W-049H). SEE MILESTONE M-17-08.	6/30/1995
M-17-43A	ELIMINATE EFFLUENT CONTRIBUTIONS TO THE 2101-M LABORATORY WASTEWATER FROM 2 TO 9 HVAC COOLERS SERVING THE 2101-M LABORATORY.	1/31/1992 (Completed)
M-17-43B	SUBMIT THE SAMPLING AND ANALYSIS PLAN FOR THE 2101-M LABORATORY WASTEWATER TO THE EPA AND ECOLOGY AS A PRIMARY DOCUMENT.	1/31/1992 (Completed)
M-17-44	SUBMIT THE SAMPLING AND ANALYSIS PLAN FOR THE 400 AREA SECONDARY COOLING WATER TO THE EPA AND ECOLOGY AS A PRIMARY DOCUMENT.	4/30/1992 (Completed)
M-18-00	COMPLETE WRAP MODULE I CONSTRUCTION AND INITIATE OPERATIONS. THE WRAP MODULE I IS REQUIRED TO SORT AND REPACKAGE WASTES THAT ARE PLANNED TO BE RETRIEVED FROM RETRIEVABLE STORAGE UNITS. MUCH OF THE WASTE CURRENTLY STORED IN THE RETRIEVABLE STORAGE UNITS IS ANTICIPATED TO BE RADIOACTIVE MIXED WASTE. SOME OF THE RADIOACTIVE WASTE STORED ON THE PADS IS KNOWN TO CONTAIN EXTREMELY HAZARDOUS WASTE AS WELL AS FEDERALLY LAND-BANNED WASTE.	3/31/1997
M-18-01	COMPLETE CONSTRUCTION OF WRAP MODULE I.	3/31/1996
M-19-00	COMPLETE WRAP MODULE II CONSTRUCTION AND INITIATE OPERATIONS. THE WRAP MODULE II WILL INCLUDE WASTE TREATMENT CAPABILITIES TO MINIMIZE LAND DISPOSAL OF LOW-LEVEL RADIOACTIVE WASTE AND RADIOACTIVE MIXED WASTE. THE SEPTEMBER 1999 COMPLETION DATE OF WRAP MODULE II IS CRITICAL TO ACHIEVING COMPLIANCE FOR THE MANAGEMENT OF WASTES THAT ARE PROHIBITED FROM LAND DISPOSAL AND EXTENDED STORAGE. WRAP MODULE 2 WILL PROVIDE FOR TREATMENT OF SECONDARY SOLID WASTE RESULTING FROM TREATED EFFLUENT DISPOSAL SYSTEMS.	9/30/1999
M-19-00--T1	INITIATE CDR FOR WRAP MODULE II (COMPLETE 3-31-90)	3/31/1990 (Completed)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-19-00--T2	COMPLETE FDC FOR WRAP MODULE II (COMPLETE 10-31-90)	7/31/1990 (Completed)
M-19-00--T3	COMPLETE WRAP MODULE II CDR	3/31/1991 (Deleted)
M-19-01	COMPLETE WRAP MODULE II CONSTRUCTION.	9/30/1998
M-19-02	****PROPOSED MILESTONE***** COMPLETE CONCEPTUAL DESIGN REPORT FOR WRAP 2A.	9/30/1992 (Completed)
M-19-03	****PROPOSED MILESTONE***** COMPLETE ENGINEERING STUDY TO DEVELOP ALTERNATIVES FOR TRANSURANIC TREATMENT AND RECOMMENDATION FOR TREATMENT (INCLUDES WRAP 2B).	3/31/1993 (Completed)
M-20-00	SUBMIT PART B PERMIT APPLICATIONS OR CLOSURE PLANS FOR ALL RCRA TSD UNITS. ALL PART B PERMIT APPLICATIONS, CLOSURE PLANS, AND POST -CLOSURE PERMIT APPLICATIONS WILL BE SUBMITTED TO ECOLOGY AND EPA BY MAY 1996. INDIVIDUAL UNIT SUBMITTALS WILL OCCUR AS SHOWN IN THE APPENDIX D WORK SCHEDULES. SCHEDULED SUBMITTAL DATES SHALL BE ENFORCEABLE AS INTERIM MILESTONES.	5/31/1996
M-20-01	SUBMIT HWVP PART B TO ECOLOGY AND EPA. (TS-2-5)	7/31/1989 (Completed)
M-20-02	SUBMIT 616 STORAGE FACILITY PART B TO ECOLOGY AND EPA. (S-6-1)	7/31/1989 (Completed)
M-20-03	SUBMIT SINGLE-SHELL TANK SYSTEM CLOSURE/CORRECTIVE ACTION WORK PLAN TO ECOLOGY AND EPA. (S-2-4)	9/30/1989 (Completed)
M-20-04	SUBMIT 2101-M POND CLOSURE PLAN TO ECOLOGY AND EPA. (D- 2-1)	9/30/1989 (Completed)
M-20-05	SUBMIT CENTRAL WASTE COMPLEX - RMW STORAGE PART B TO ECOLOGY AND EPA. (TS-2-4)	10/31/1991 (Completed)
M-20-06	SUBMIT LOW-LEVEL BURIAL GROUNDS PART B TO ECOLOGY AND EPA. (D-2-9)	12/31/1989 (Completed)
M-20-07	SUBMIT NONRADIOACTIVE DANGEROUS WASTE LANDFILL CLOSURE/POSTCLOSURE PLAN TO ECOLOGY AND EPA. (D-6-1)	8/31/1990 (Completed)
M-20-08	SUBMIT 305-B WASTE STORAGE FACILITY PART B TO ECOLOGY AND EPA. (S-3-2)	1/31/1990 (Completed)
M-20-09	SUBMIT 216-B-3 POND CLOSURE/POST-CLOSURE PLAN TO ECOLOGY AND EPA. (D-2-5)	3/31/1990 (Completed)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-20-10	SUBMIT 300 AREA WASTE ACID SYSTEM CLOSURE PLAN TO ECOLOGY AND EPA. (TS-3-1) (INCLUDES 311 TANKS)	6/30/1990 (Completed)
M-20-10--T1	SUBMIT FOR DOE REVIEW 300 AREA WASTE ACID SYSTEM CLOSURE PLAN.	3/31/1990 (Completed)
M-20-11	SUBMIT PUREX TUNNELS PART B TO ECOLOGY AND EPA. (S-2-1)	9/30/1990 (Completed)
M-20-11--T1	SUBMIT FOR DOE REVIEW PUREX TUNNELS PART B (TS-2-4)	6/30/1990 (Completed)
M-20-12	SUBMIT CENTRAL WASTE COMPLEX - WRAP PART B TO ECOLOGY AND EPA. (TS-2-4)	10/31/1991 (Completed)
M-20-13	SUBMIT 303-K STORAGE AREA CLOSURE PLAN TO ECOLOGY AND EPA. (S-3-1)	4/30/1990 (Completed)
M-20-13--T1	SUBMIT FOR DOE REVIEW 303-K STORAGE AREA CLOSURE PLAN	1/31/1990 (Completed)
M-20-14	SUBMIT 4843 ALKALI METAL STORAGE FACILITY CLOSURE PLAN TO ECOLOGY AND EPA. (S-4-1)	6/30/1991 (Completed)
M-20-14--T1	SUBMIT FOR DOE REVIEW 4843 ALKALI METAL STORAGE FACILITY CLOSURE PLAN.	3/31/1991 (Completed)
M-20-15	SUBMIT 304 CONCRETION FACILITY CLOSURE PLAN TO ECOLOGY AND EPA. (TS-3-2)	4/30/1990 (Completed)
M-20-15--T1	SUBMIT FOR DOE REVIEW 304 CONCRETION FACILITY CLOSURE PLAN	1/31/1990 (Completed)
M-20-16	SUBMIT DOUBLE-SHELL TANK PART B TO ECOLOGY AND EPA. (S-2-3)	6/30/1991 (Completed)
M-20-17	SUBMIT 242-A EVAPORATOR PART B TO ECOLOGY AND EPA. (T-2-6)	6/30/1991 (Completed)
M-20-18	SUBMIT 3718-F ALKALI METAL TREATMENT AND STORAGE FACILITY CLOSURE PLAN TO ECOLOGY AND EPA. (TS-3-3)	12/31/1991 (Completed)
M-20-19	SUBMIT SIMULATED HIGH-LEVEL SLURRY TREATMENT/STORAGE CLOSURE PLAN TO ECOLOGY AND EPA. (TS-3-4)	9/30/1989 (Completed)
M-20-20	SUBMIT 325 WASTE TREATMENT UNIT AND 3100 HAZARDOUS WASTE TREATMENT UNIT PART B TO ECOLOGY AND EPA. (T-3-4)	6/30/1992 (Completed)
M-20-21	ESTABLISH NEW INTERIM MILESTONE DATE FOR SUBMITTAL OF B PLANT PART B PERMIT APPLICATION OR CLOSURE PLAN. (TS-2-3)	1/31/1992 (Completed)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-20-21A	SUBMIT B PLANT PART B PERMIT APPLICATION TO ECOLOGY AND EPA. (TS-2-3) THE DATE OF SEPTEMBER 1995 IS PREDICATED ON THE NEED TO COMPLETE A SERIES OF ANALYSES, EXPECTED TO TAKE 18 MONTHS, WHICH DEFINE REQUIRED PLANT CLEANUP ACTIVITIES, AND ASSOCIATED ESTIMATES AND SCHEDULES. FOLLOWING THIS, THE PART B PERMIT APPLICATION PREPARATION IS EXPECTED TO TAKE 24 MONTHS.	9/30/1995
M-20-22	SUBMIT 222-S LABORATORY PART B TO ECOLOGY AND EPA. (TS-2-1)	12/31/1991 (Completed)
M-20-23	SUBMIT TRUSAF STORAGE PART B TO ECOLOGY AND EPA. (S-2-2)	6/30/1992 (Completed)
M-20-24	SUBMIT PUREX PART B PERMIT APPLICATION OR CLOSURE PLAN TO EPA & ECOLOGY.	7/31/1995
M-20-25	SUBMIT HANFORD PATROL ACADEMY DEMOLITION SITES CLOSURE PLAN TO ECOLOGY AND EPA. (T-11-1)	11/30/1992 (Completed)
M-20-26	SUBMIT ASH PIT DEMOLITION SITE CLOSURE PLAN TO ECOLOGY AND EPA. (T-2-2)	11/30/1992 (Completed)
M-20-27	SUBMIT HEXONE STORAGE AND TREATMENT CLOSURE PLAN TO ECOLOGY AND EPA. (TS-2-2)	11/30/1992 (Completed)
M-20-28	SUBMIT E-8 BORROW PIT DEMOLITION SITE CLOSURE PLAN TO ECOLOGY AND EPA. (T-2-1)	11/30/1992 (Completed)
M-20-29	SUBMIT MASF PART B TO ECOLOGY AND EPA. (T-4-1)	TBD
M-20-30	SUBMIT 303-M OXIDE FACILITY PART B TO ECOLOGY AND EPA. (T-3-2)	10/31/1992 (Deleted)
M-20-31	SUBMIT 1301-N/1325-N CLOSURE PLAN/POSTCLOSURE PLAN TO ECOLOGY AND EPA. (D-1-2)	5/31/1994
M-20-32	SUBMIT 300 AREA PROCESS TRENCHES CLOSURE/POSTCLOSURE PLAN TO ECOLOGY AND EPA. (D-3-1)	8/15/1994
M-20-33	SUBMIT 216-A-10 CRIB CLOSURE/POSTCLOSURE PLAN TO ECOLOGY AND EPA. (D-2-2)	3/31/1996
M-20-34	SUBMIT 216-A-36B CRIB CLOSURE/POSTCLOSURE PLAN TO ECOLOGY AND EPA. (D-2-4)	3/31/1996
M-20-35	SUBMIT 1324-N/1324-NA CLOSURE PLAN TO ECOLOGY AND EPA. (T-1-2)	9/30/1994
M-20-36	SUBMIT 216-A-29 DITCH CLOSURE/POSTCLOSURE PLAN TO ECOLOGY AND EPA. (D-2-3)	5/31/1996

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-20-37	SUBMIT 216-U-12 CRIB CLOSURE/POSTCLOSURE PLAN TO ECOLOGY AND EPA. (D-2-8)	11/30/1994
M-20-38	SUBMIT 216-B-63 TRENCH CLOSURE PLAN TO ECOLOGY AND EPA. (D-2-6)	5/31/1996
M-20-39	SUBMIT 216-S-10 POND AND DITCH CLOSURE PLAN TO ECOLOGY AND EPA. (D-2-7)	5/31/1996
M-20-40	SUBMIT 100-D POND CLOSURE PLAN TO ECOLOGY AND EPA. (D-1-1)	2/28/1993 (Completed)
M-20-41	SUBMIT 105-DR CLOSURE PLAN TO ECOLOGY AND EPA. (T-1-1)	9/30/1990 (Completed)
M-20-41--T1	SUBMIT FOR DOE REVIEW 105-DR CLOSURE PLAN.	6/30/1990 (Completed)
M-20-42	SUBMIT THERMAL TREATMENT PART B TO ECOLOGY AND EPA. (T-X-3)	12/31/1994
M-20-43	SUBMIT PHYSICAL/CHEMICAL TREATMENT PART B TO ECOLOGY AND EPA. (T-X-2)	12/31/1994
M-20-44	SUBMIT BIOLOGICAL TREATMENT PART B TO ECOLOGY AND EPA. (T-X-1)	12/31/1995
M-20-45	SUBMIT PETITIONS TO ECOLOGY TO WITHDRAW PART A PERMIT APPLICATIONS FOR 332 STORAGE FACILITY, 1706-KE TREATMENT FACILITY, 2727-WA STORAGE FACILITY, 221-T ALKALI METAL TREATMENT AND STORAGE FACILITY, AND 324 SODIUM TREATMENT PILOT PLANT.	6/30/1989 (Completed)
M-20-46	SUBMIT PETITIONS TO ECOLOGY TO MANAGE THE FOLLOWING FACILITIES AS "TREATMENT BY GENERATOR" FACILITIES: T PLANT TREATMENT TANK, 222-S TREATMENT TANK, PUREX TREATMENT TANKS, 204-AR WASTE UNLOADING FACILITY, AND 241-Z TREATMENT TANK.	6/30/1989 (Completed)
M-20-47	SUBMIT PART B PERMIT APPLICATION FOR 200 EAST AREA LIQUID EFFLUENT RETENTION FACILITY (LERF) TO ECOLOGY AND EPA. (S-2-3)	6/30/1991 (Completed)
M-20-48	SUBMIT THE 241-Z TREATMENT AND STORAGE TANKS PART B PERMIT APPLICATION TO ECOLOGY AND EPA.	5/31/1996
M-20-49	SUBMIT RCRA RESEARCH, DEVELOPMENT AND DEMONSTRATION (RD&D) PERMIT APPLICATION FOR THE 242-A EVAPORATOR/PUREX PLANT PROCESS CONDENSATE TREATMENT FACILITY (PROJECT C-018H) PILOT PLANT TESTING IN ACCORDANCE WITH 40 CFR 270.65. (T-2-8)	10/31/1991 (Completed)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-20-50	SUBMIT COMPLETE RCRA PART B PERMIT APPLICATION FOR THE 242-A EVAPORATOR/PUREX PLANT PROCESS CONDENSATE TREATMENT FACILITY (PROJECT C-018H) TO ECOLOGY FOR APPROVAL, WHICH INCLUDES 80% DESIGN DETAIL & AVAILABLE PILOT PLANT TEST RESULTS, TO ECOLOGY AS A PRIMARY DOCUMENT. (T-2-8)	8/31/1993 (Completed)
M-20-51	SUBMIT T PLANT COMPLEX PART B PERMIT APPLICATION TO ECOLOGY AND EPA.	12/31/1995
M-21-00	SUBMIT RCRA INTERIM STATUS COMPLIANCE ASSESSMENTS FOR ALL TSD UNITS. RCRA OPERATIONAL UNITS AND THOSE UNDERGOING CLOSURE WILL BE ASSESSED FOR COMPLIANCE WITH RCRA AND STATE DANGEROUS WASTE INTERIM STATUS REQUIREMENTS. PART A APPLICATIONS WHICH WILL BE WITHDRAWN OR UNITS NOT YET CONSTRUCTED ARE NOT INCLUDED IN THESE ASSESSMENTS. COPIES OF THE ASSESSMENT DOCUMENTATION WILL BE PROVIDED TO ECOLOGY WITHIN 30 DAYS OF ASSESSMENT COMPLETION. THE LAST ASSESSMENT WILL BE COMPLETED BY MARCH 31, 1989. FACILITIES TO BE ASSESSED BY MARCH 31, 1989, INCLUDE TANK FARMS, LOW-LEVEL BURIAL GROUNDS, PLUTONIUM FINISHING PLANT, PUREX, B PLANT, N REACTOR, 100 K AREA FUEL STORAGE, FAST FLUX TEST FACILITY, T PLANT, 222-S, 616 STORAGE FACILITY, CENTRAL WASTE COMPLEX, NONRADIOACTIVE DANGEROUS WASTE LANDFILL, 300 AREA FUEL FABRICATION FACILITIES, PATROL DEMOLITION SITE, 4843 SODIUM STORAGE FACILITY, 3718-F ALKALI METAL TREATMENT AND STORAGE, SINGLE-SHELL TANKS, HEXONE TANKS, 183-H, 2727-S, 300 AREA SOLVENT EVAPORATOR, 105-DR SODIUM FIRE FACILITY, E-8 BORROW PIT, 200 WEST ASH PIT, 216-U-12 CRIB, 2101-M POND, 216-S-10 DITCH AND POND, AND 100-D PONDS.	4/30/1989 (Completed)
M-22-00	ESTABLISH ENFORCEABLE COMPLIANCE ACTION SCHEDULES. SCHEDULES WILL BE DEVELOPED FOR REVIEW AND APPROVAL BY ECOLOGY AND EPA FOR ANY ACTIONS IDENTIFIED IN THE INTERIM STATUS COMPLIANCE ASSESSMENTS THAT ARE NECESSARY TO ENSURE COMPLIANCE WITH INTERIM STATUS REQUIREMENTS. SPECIFIC COMPLIANCE ACTIONS WILL BECOME ENFORCEABLE INTERIM MILESTONES UNDER M-23-00.	12/31/1989 (Completed)
M-22-01	SUBMIT PETITIONS OR REQUESTS FOR VARIANCE FROM INTERIM STATUS STANDARDS TO ECOLOGY AND EPA.	9/30/1989 (Completed)
M-23-00	COMPLETE INTERIM STATUS CORRECTIVE ACTIONS. COMPLETE ACTIONS IDENTIFIED IN INTERIM STATUS COMPLIANCE ASSESSMENTS (M-21-00) EXCLUDING GROUNDWATER MONITORING AND CLOSURE PLANS. PETITIONS FOR MODIFICATION OF INSPECTION AND LABELING REQUIREMENTS WERE SUBMITTED TO ECOLOGY IN SEPTEMBER 1989 (M-21-01). PENDING RESOLUTION, INSPECTIONS AND LABELING WILL BE PERFORMED PER EXISTING OPERATIONS PROCEDURES.	9/30/1991 (Completed)



Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-23-01	RESUBMIT TREATMENT BY GENERATOR REQUESTS FOR: T-PLANT, 222-S, PUREX AND 204-AR (COMPLETE 6-19-90).	6/30/1990 (Completed)
M-23-01--T2	RESUBMIT TREATMENT BY GENERATOR REQUEST FOR 222-S (COMPLETE 6-19-90).	6/30/1990 (Completed)
M-23-01--T3	RESUBMIT TREATMENT BY GENERATOR REQUEST FOR PUREX (COMPLETE 6-19-90)	6/30/1990 (Completed)
M-23-01--T4	RESUBMIT TREATMENT BY GENERATOR REQUEST FOR 204-AR (COMPLETE 6-19-90)	6/30/1990 (Completed)
M-23-01A	RESUBMIT TREATMENT BY GENERATOR REQUESTS FOR T-PLANT.	9/30/1991 (Completed)
M-23-02	RESUBMIT REQUEST FOR PART A WITHDRAWAL FOR: 221-T CONTAINMENT SYSTEM TEST FACILITY AND THE 324 SODIUM REMOVAL PILOT PLANT. (COMPLETE 12-24-89)	1/31/1990 (Completed)
M-23-03	COMPLETE WASTE ANALYSIS PLANS FOR DOUBLE SHELL TANKS, 242-A EVAPORATOR, AND B-PLANT ACTIVE TSD UNITS WASTE ANALYSIS PLANS WILL BE UPGRADED WHEN ADDITIONAL LABORATORY CAPABILITIES ARE AVAILABLE PURSUANT TO MILESTONES M-11-00 AND M-14-00.	12/31/1990 (Completed)
M-23-03--T1	COMPLETE WASTE ANALYSIS PLAN FOR DST (COMPLETE 12-31-90)	12/31/1990 (Completed)
M-23-03--T2	COMPLETE WASTE ANALYSIS PLAN FOR 242-A (COMPLETE 12-31-90)	12/31/1990 (Completed)
M-23-03-T3	COMPLETE WASTE ANALYSIS PLAN FOR B PLANT (COMPLETE 12-31-90)	12/31/1990 (Completed)
M-23-04	COMPLETE WASTE ANALYSIS PLAN FOR 4843 STORAGE FACILITY AND SINGLE SHELL TANKS.	6/30/1990 (Completed)
M-23-04--T1	COMPLETE WASTE ANALYSIS PLAN FOR 4843	6/30/1990 (Completed)
M-23-04--T2	COMPLETE WASTE ANALYSIS PLAN FOR SST	6/30/1990 (Completed)
M-23-05	COMPLETE CONTINGENCY PLANS FOR LLBG, 4843 STORAGE FACILITY, CENTRAL WASTE COMPLEX, T-PLANT, TRUSAF AND 616.	6/30/1990 (Completed)
M-23-05--T1	COMPLETE CONTINGENCY PLAN FOR LLBG	6/30/1990 (Completed)
M-23-05--T2	COMPLETE CONTINGENCY PLAN FOR 4843 STORAGE FACILITY	6/30/1990 (Completed)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-23-05--T3	COMPLETE CONTINGENCY PLAN FOR CENTRAL WASTE COMPLEX	6/30/1990 (Completed)
M-23-05--T4	COMPLETE CONTINGENCY PLAN FOR T PLANT	6/30/1990 (Completed)
M-23-05--T5	COMPLETE CONTINGENCY PLAN FOR TRUSAF	6/30/1990 (Completed)
M-23-05--T6	COMPLETE CONTINGENCY PLAN FOR 616	6/30/1990 (Completed)
M-23-06	COMPLETE CONTINGENCY PLANS FOR SST, DST AND 242-A EVAPORATOR.	10/31/1990 (Completed)
M-23-06--T1	COMPLETE CONTINGENCY PLAN FOR SST	10/31/1990 (Completed)
M-23-06--T2	COMPLETE CONTINGENCY PLAN FOR DST	10/31/1990 (Completed)
M-23-06--T3	COMPLETE CONTINGENCY PLAN FOR 242-A EVAPORATOR	10/31/1990 (Completed)
M-23-07	COMPLETE INTERIM STATUS CORRECTIVE ACTIONS FOR 222-S STORAGE PAD.	3/31/1990 (Completed)
M-23-08	COMPLETE INTERIM STATUS CORRECTIVE ACTIONS FOR 4843 STORAGE FACILITY.	6/30/1990 (Completed)
M-23-08--T1	DEVELOP WASTE ANALYSIS PLAN FOR 4843 STORAGE FACILITY.	6/30/1990 (Completed)
M-23-08--T2	UPGRADE CONTINGENCY PLAN FOR 4843 STORAGE FACILITY	6/30/1990 (Completed)
M-23-09	NOTIFY ECOLOGY OF DECISION ON OPERATING STATUS OF 3718-F ALKALI METAL TREATMENT FACILITY.	9/30/1990 (Completed)
M-23-10	COMPLETE INTERIM STATUS CORRECTIVE ACTIONS FOR 3718-F.	9/30/1991 (Deleted)
M-23-11	COMPLETE INTERIM STATUS CORRECTIVE ACTIONS FOR SINGLE SHELL TANKS.	12/31/1990 (Completed)
M-23-11--T1	DEVELOP INSPECTION PLAN FOR SINGLE SHELL TANKS	10/31/1990 (Completed)
M-23-11--T2	MAINTAIN INSPECTION IN SINGLE SHELL TANK OPERATING RECORD	8/31/1990 (Completed)
M-23-11--T3	DEVELOP SINGLE SHELL TANK TRAINING PLAN	9/30/1990 (Completed)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-23-11--T4	REVIEW AND UPDATE SINGLE SHELL TANK CONTINGENCY PLANS	10/31/1990 (Completed)
M-23-11--T5	DEVELOP SINGLE SHELL TANK WASTE ANALYSIS PLAN	6/30/1990 (Completed)
M-23-11--T6	DETERMINE IF ANNUAL FIRE INSPECTIONS REQUIRED FOR SINGLE SHELL TANKS	12/31/1990 (Completed)
M-23-12	COMPLETE INTERIM STATUS CORRECTIVE ACTIONS FOR DOUBLE SHELL TANKS.	12/31/1990 (Completed)
M-23-12--T1	CORRELATE DOUBLE SHELL TANK PROCEDURES TO RCRA AND PREPARE INSPECTION PLAN MATRIX	8/31/1990 (Completed)
M-23-12--T2	DEVELOP DOUBLE SHELL TANK TRAINING PLAN(S)	9/30/1990 (Completed)
M-23-12--T3	UPGRADE DOUBLE SHELL TANK CONTINGENCY PLAN	10/31/1990 (Completed)
M-23-12--T4	CONSOLIDATE DOUBLE SHELL TANK WASTE ANALYSIS REQUIREMENTS AND CORRELATE PROCEDURES TO RCRA REQUIREMENTS	12/31/1990 (Completed)
M-23-13	COMPLETE INTERIM STATUS CORRECTIVE ACTIONS FOR 242-A EVAPORATOR.	12/31/1990 (Completed)
M-23-13--T1	CORRELATE 242-A EVAPORATOR PROCEDURES TO RCRA AND PREPARE INSPECTION PLAN MATRIX	8/31/1990 (Completed)
M-23-13--T2	DEVELOP 242-A EVAPORATOR TRAINING PLAN(S)	9/30/1990 (Completed)
M-23-13--T3	UPGRADE 242-A EVAPORATOR CONTINGENCY PLAN	10/31/1990 (Completed)
M-23-13--T4	CONSOLIDATE 242-A EVAPORATOR WASTE ANALYSIS REQUIREMENTS AND CORRELATE PROCEDURES TO RCRA REQUIREMENTS.	12/31/1990 (Completed)
M-23-14	COMPLETE INTERIM STATUS CORRECTIVE ACTIONS FOR LOW LEVEL BURIAL GROUNDS.	1/31/1991 (Completed)
M-23-14--T1	UPGRADE LOW LEVEL BURIAL GROUNDS CONTINGENCY PLAN	6/30/1990 (Completed)
M-23-14--T2	PROVIDE FOR INSPECTION OF LOW LEVEL BURIAL GROUNDS MIXED WASTE IN RETRIEVABLE STORAGE TRENCHES	6/30/1990 (Completed)
M-23-14--T3	LABEL LOW LEVEL BURIAL GROUNDS HAZARDOUS WASTE CONTAINERS AND ACCESSIBLE MIXED WASTE BACKLOG	6/30/1990 (Completed)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-23-15	COMPLETE INTERIM STATUS CORRECTIVE ACTIONS FOR TRUSAF. (224-T)	6/30/1990 (Completed)
M-23-16	COMPLETE INTERIM STATUS CORRECTIVE ACTIONS FOR 616 FACILITY.	6/30/1990 (Completed)
M-23-17	COMPLETE INTERIM STATUS CORRECTIVE ACTIONS FOR CENTRAL WASTE COMPLEX.	6/30/1990 (Completed)
M-23-18	COMPLETE INTERIM STATUS CORRECTIVE ACTIONS FOR B-PLANT.	9/30/1991 (Completed)
M-23-18--T1	TRAINING FOR B-PLANT DANGEROUS WASTE WORKERS	4/30/1990 (Completed)
M-23-18--T2	WASTE ANALYSIS PLAN FOR ACTIVE B-PLANT TSD UNIT	12/31/1990 (Completed)
M-23-18--T3	REVISE B PLANT INSPECTION PLAN	6/30/1991 (Completed)
M-23-18--T4	REVISE B PLANT CONTINGENCY PLAN	9/30/1991 (Completed)
M-23-19	COMPLETE ALL B-PLANT CELL FOUR CORRECTIVE ACTIONS.	12/31/1990 (Completed)
M-23-19--T1	B-PLANT CELL FOUR DESIGNATED DRY WASTE CRITERIA	8/31/1990 (Completed)
M-23-19--T2	B-PLANT CELL FOUR CONCRETE SLAB FUNCTION DEFINED AND PROTECTIVE COATING SPECIFIED	8/31/1990 (Completed)
M-23-19--T3	PROCEDURES FOR B-PLANT CELL FOUR CONTAINER LIQUIDS	8/31/1990 (Completed)
M-23-19--T4	B-PLANT CELL FOUR PAINT WASTE DESIGNATION VERIFIED	8/31/1990 (Completed)
M-23-19--T5	B-PLANT CELL FOUR SODIUM VAPOR LIGHTS SEPARATED FROM SPRINKLER SYSTEM	12/31/1990 (Completed)
M-23-19--T6	B-PLANT CELL FOUR CONTAINER LABELING PROCEDURE	12/31/1990 (Completed)
M-23-19--T7	B-PLANT CELL FOUR INCOMPATIBLE WASTE STORAGE DOCUMENTATION.	12/31/1990 (Completed)
M-23-20	COMPLETE INTERIM STATUS CORRECTIVE ACTIONS FOR T-PLANT.	1/31/1991 (Completed)
M-23-20--T1	REVISE T-PLANT CONTINGENCY PLAN	6/30/1990 (Completed)

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Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-23-20--T2	T-PLANT WASTE ANALYSIS PLAN	1/31/1991 (Completed)
M-24-00	<p>INSTALL RCRA GROUNDWATER MONITORING WELLS AT THE RATE OF 29-CY 1989, 30-CY 1990, AND UP TO 50/YEAR THEREAFTER AS SPECIFIED BY AGREED INTERIM MILESTONES UNTIL ALL LAND DISPOSAL UNITS AND SINGLE-SHELL TANKS ARE DETERMINED TO HAVE RCRA COMPLIANT MONITORING SYSTEMS. USDOE WILL INSTALL GROUNDWATER MONITORING WELLS AROUND RCRA LAND DISPOSAL UNITS AND THE SINGLE-SHELL TANKS AT THE RATE DESCRIBED ABOVE UNTIL ECOLOGY AGREES THAT ALL SUCH GROUNDWATER MONITORING SYSTEMS MEET THE REQUIREMENTS OF WAC 173-303-645.</p> <p>INSTALLATION OF GROUNDWATER WELLS SHALL MEAN THAT WELLS HAVE BEEN DRILLED, ADEQUATELY SEALED, AND SCREENED OVER NO MORE THAN 15 FEET OF THE AQUIFER UNLESS OTHERWISE APPROVED BY ECOLOGY, THAT ALL PUMPS AND ASSOCIATED SAMPLING EQUIPMENT HAVE BEEN INSTALLED, AND THAT SUCH WELLS HAVE BEEN DEVELOPED SUFFICIENTLY TO PROVIDE SATISFACTORY SAMPLES FOR ALL PARAMETERS TO BE ANALYZED.</p> <p>SPECIFIC UNITS TO RECEIVE GROUNDWATER WELLS AND THE NUMBER OF WELLS TO BE INSTALLED AT EACH UNIT WILL BE IDENTIFIED IN APPENDIX D IN TWO-YEAR INTERVALS (I.E., CY 1989 AND CY 1990 NOW, CY 1990 AND CY 1991 AT THE NEXT ANNUAL UPDATE, ETC.). SUCH SCHEDULES WILL BE ENFORCEABLE AS INTERIM MILESTONES.</p>	12/31/1999
M-24-00A	INSTALL RCRA GROUNDWATER MONITORING WELLS AT THE RATE OF 29 IN CY 1989. (PLEASE REFER TO MILESTONE M-24-00 FOR WORDING DETERMINING NUMBER OF WELLS TO BE DRILLED IN ANY ONE YEAR).	12/31/1989 (Completed)
M-24-00B	INSTALL RCRA GROUNDWATER MONITORING WELLS AT THE RATE OF 30 IN CY 1990. (PLEASE REFER TO MILESTONE M-24-00 FOR WORDING DETERMINING NUMBER OF WELLS TO BE DRILLED IN ANY ONE YEAR).	10/07/1991 (Completed)
M-24-00B-T1	EPA/ECOLOGY CONCUR ON CY91 WELLS LOCATIONS	6/30/1990 (Completed)
M-24-00C	INSTALL RCRA GROUNDWATER MONITORING WELLS AT THE RATE OF 50 IN CY 1991. (PLEASE REFER TO MILESTONE M-24-00 FOR WORDING DETERMINING NUMBER OF WELLS TO BE DRILLED IN ANY ONE YEAR).	12/31/1991 (Completed)
M-24-00D	INSTALL RCRA GROUNDWATER MONITORING WELLS AT THE RATE OF UP TO 50 IN CY 1992 AS SPECIFIED IN AGREED INTERIM MILESTONES. (PLEASE REFER TO MILESTONE M-24-00 FOR WORDING DETERMINING NUMBER OF WELLS TO BE DRILLED IN ANY ONE YEAR).	12/31/1992 (Completed)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-24-00E	INSTALL RCRA GROUNDWATER MONITORING WELLS AT THE RATE OF UP TO 50 IN CY 1993 AS SPECIFIED IN AGREED TO INTERIM MILESTONES. (PLEASE REFER TO MILESTONE M-24-00 FOR WORDING DETERMINING NUMBER OF WELLS TO BE DRILLED IN ANY ONE YEAR).	12/31/1993 (Completed)
M-24-00F	INSTALL RCRA GROUNDWATER MONITORING WELLS AT THE RATE OF UP TO 50 IN CY 1994 (IF REQUIRED). (PLEASE REFER TO MILESTONE M-24-00 FOR WORDING DETERMINING NUMBER OF WELLS TO BE DRILLED IN ANY ONE YEAR).	12/31/1994
M-24-00G	INSTALL RCRA GROUNDWATER MONITORING WELLS AT THE RATE OF UP TO 50 IN CY 1995 (IF REQUIRED). (PLEASE REFER TO MILESTONE M-24-00 FOR WORDING DETERMINING NUMBER OF WELLS TO BE DRILLED IN ANY ONE YEAR).	12/31/1995
M-24-00H	INSTALL RCRA GROUNDWATER MONITORING WELLS AT THE RATE OF UP TO 50 IN CY 1996 (IF REQUIRED). (PLEASE REFER TO MILESTONE M-24-00 FOR WORDING DETERMINING NUMBER OF WELLS TO BE DRILLED IN ANY ONE YEAR).	12/31/1996
M-24-00I	INSTALL RCRA GROUNDWATER MONITORING WELLS AT THE RATE OF UP TO 50 IN CY 1997 (IF REQUIRED). (PLEASE REFER TO MILESTONE M-24-00 FOR WORDING DETERMINING NUMBER OF WELLS TO BE DRILLED IN ANY ONE YEAR).	12/31/1997
M-24-00J	INSTALL RCRA GROUNDWATER MONITORING WELLS AT THE RATE OF UP TO 50 IN CY 1998 (IF REQUIRED). (PLEASE REFER TO MILESTONE M-24-00 FOR WORDING DETERMINING NUMBER OF WELLS TO BE DRILLED IN ANY ONE YEAR).	12/31/1998
M-24-00K	INSTALL RCRA GROUNDWATER MONITORING WELLS AT THE RATE OF UP TO 50 IN CY 1999 (IF REQUIRED). (PLEASE REFER TO MILESTONE M-24-00 FOR WORDING DETERMINING NUMBER OF WELLS TO BE DRILLED IN ANY ONE YEAR).	12/31/1999
M-24-01	INSTALL 10 ADDITIONAL WELLS AROUND THE LOW-LEVEL BURIAL GROUNDS FOR A TOTAL OF 45 RCRA GROUNDWATER WELLS.	12/31/1989 (Completed)
M-24-02	INSTALL 5 ADDITIONAL WELLS AROUND B POND FOR A TOTAL OF 9 RCRA MONITORING WELLS.	12/31/1989 (Completed)
M-24-03	INSTALL 12 WELLS AROUND THE SSTs FOR A TOTAL OF 12 RCRA MONITORING WELLS.	12/31/1989 (Completed)
M-24-04	INSTALL 2 ADDITIONAL WELLS AROUND THE GROUT VAULT AREA FOR A TOTAL OF 7 RCRA MONITORING WELLS.	12/31/1989 (Completed)
M-24-05	INSTALL 1 ADDITIONAL WELL AROUND THE GROUT VAULT AREA FOR A TOTAL OF 8 RCRA MONITORING WELLS.	12/31/1990 (Completed)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-24-06	INSTALL 6 ADDITIONAL WELLS AROUND THE LOW-LEVEL BURIAL GROUNDS FOR A TOTAL OF 51 RCRA MONITORING WELLS. (COMPLETE 4/30/1990).	12/31/1990 (Completed)
M-24-07	INSTALL 11 ADDITIONAL WELLS AROUND THE SSTs FOR A TOTAL OF 23 RCRA MONITORING WELLS. (COMPLETE 4/30/1991).	10/07/1991 (Completed)
M-24-08	INSTALL 4 WELLS AROUND B-63 TRENCH FOR A TOTAL OF 4 RCRA MONITORING WELLS. (COMPLETE 4/30/1990)	12/31/1990 (Completed)
M-24-09	INSTALL 3 WELLS AROUND THE S-10 DITCH AND POND FOR A TOTAL OF 3 RCRA MONITORING WELLS.	12/31/1990 (Completed)
M-24-10	INSTALL 4 WELLS AROUND THE U-12 CRIB FOR A TOTAL OF 4 RCRA MONITORING WELLS. (COMPLETE 5/31/1990).	12/31/1990 (Completed)
M-24-11	INSTALL 1 ADDITIONAL WELL AROUND B POND FOR A TOTAL OF 10 RCRA MONITORING WELLS. (COMPLETE 12/31/1989).	12/31/1990 (Completed)
M-24-12	INSTALL 18 ADDITIONAL RCRA WELLS AROUND LOW-LEVEL BURIAL GROUNDS (69 TOTAL).	12/31/1991 (Completed)
M-24-13	INSTALL 3 RCRA WELLS AROUND 216-S10-POND.	12/31/1991 (Completed)
M-24-14	INSTALL 4 ADDITIONAL RCRA WELLS AROUND THE 100-D PONDS.	12/31/1991 (Completed)
M-24-15	INSTALL 10 ADDITIONAL RCRA WELLS AROUND THE SSTs (33 TOTAL).	12/31/1991 (Completed)
M-24-16	INSTALL 7 ADDITIONAL RCRA WELLS AROUND THE B POND (17 TOTAL).	12/31/1991 (Completed)
M-24-17	INSTALL 3 ADDITIONAL RCRA WELLS AROUND THE 1324-N/NA AND 1 AROUND THE 1324-N PONDS.	12/31/1991 (Completed)
M-24-18	INSTALL 4 ADDITIONAL RCRA WELLS AROUND THE 216-A-29 DITCH.	12/31/1991 (Completed)
M-24-19	INSTALL 10 ADDITIONAL RCRA WELLS AROUND LOW-LEVEL BURIAL GROUNDS (79 TOTAL).	12/31/1992 (Completed)
M-24-20	INSTALL 2 ADDITIONAL RCRA WELLS AROUND THE GROUT FACILITY (10 TOTAL).	12/31/1992 (Completed)
M-24-21	INSTALL 2 RCRA WELLS AROUND THE 1301-N CRIB (9 TOTAL).	12/31/1992 (Completed)
M-24-22	INSTALL 1 ADDITIONAL RCRA WELL AROUND THE 1324-N POND (12 TOTAL).	12/31/1992 (Completed)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-24-23	INSTALL 1 ADDITIONAL RCRA WELL AROUND S-10 POND AND DITCH (7 TOTAL).	12/31/1992 (Completed)
M-24-24	INSTALL 2 ADDITIONAL RCRA WELLS AROUND THE B-63 TRENCH (5 TOTAL).	12/31/1992 (Completed)
M-24-25	INSTALL 2 ADDITIONAL RCRA WELLS AROUND THE 216-A-29 DITCH (9 TOTAL).	12/31/1992 (Completed)
M-24-26	INSTALL 2 RCRA WELLS AROUND THE NRDWL (9 TOTAL).	12/31/1992 (Completed)
M-24-27	INSTALL 2 ADDITIONAL RCRA WELLS AROUND THE B POND (19 TOTAL).	12/31/1992 (Completed)
M-24-28	INSTALL 2 ADDITIONAL RCRA WELLS AROUND THE SSTs (35 TOTAL).	12/31/1992 (Completed)
M-24-29	ECOLOGY MAY IDENTIFY LOCATIONS FOR 4 ADDITIONAL RCRA WELLS TO BE INSTALLED BY DECEMBER 1992 OR WITHIN NINE MONTHS OF THE DATE THE LOCATIONS IDENTIFIED.	3/31/1992 (Completed)
M-24-30	INSTALL 1 ADDITIONAL RCRA WELLS AROUND THE 1325-N CRIB (3 TOTAL).	12/31/1993 (Completed)
M-24-31	INSTALL 2 ADDITIONAL RCRA WELLS AROUND THE LOW-LEVEL BURIAL GROUNDS (81 TOTAL).	12/31/1993 (Completed)
M-24-32	INSTALL 3 ADDITIONAL RCRA WELLS AROUND THE GROUT FACILITY (13 TOTAL).	12/31/1993 (Completed)
M-25-00A	PROVIDE ANNUAL REPORTS OF STUDIES/EFFORTS THAT ARE IN PROGRESS TO IDENTIFY ALTERNATIVES TO LAND DISPOSAL OF RADIOACTIVE MIXED WASTE.	3/31/1990 (Completed)
M-25-00B	PROVIDE ANNUAL REPORTS OF STUDIES/EFFORTS THAT ARE IN PROGRESS TO IDENTIFY ALTERNATIVES TO LAND DISPOSAL OF RADIOACTIVE MIXED WASTE.	3/31/1991 (Completed)
M-25-00C	PROVIDE ANNUAL REPORTS OF STUDIES/EFFORTS THAT ARE IN PROGRESS TO IDENTIFY ALTERNATIVES TO LAND DISPOSAL OF RADIOACTIVE MIXED WASTE.	3/31/1992 (Deleted)
M-26-00	SUBMIT HANFORD LAND DISPOSAL RESTRICTIONS PLAN FOR MIXED WASTES (LDR PLAN).	10/31/1990 (Completed)
M-26-01A	SUBMIT AN ANNUAL HANFORD LAND DISPOSAL RESTRICTIONS REPORT IN ACCORDANCE WITH THE LDR PLAN TO COVER THE PERIOD FROM 10-1 THROUGH 9-30.	10/31/1991 (Completed)



Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-26-01B	SUBMIT AN ANNUAL HANFORD LAND DISPOSAL RESTRICTIONS REPORT IN ACCORDANCE WITH THE LDR PLAN TO COVER THE PERIOD FROM 4-1 OF THE PREVIOUS YEAR THROUGH 3-31 OF THE REPORTING YEAR.	4/30/1992 (Completed)
M-26-01C	SUBMIT AN ANNUAL HANFORD LAND DISPOSAL RESTRICTIONS REPORT IN ACCORDANCE WITH THE LDR PLAN TO COVER THE PERIOD FROM 4-1 OF THE PREVIOUS YEAR TO THROUGH 3-31 OF THE REPORTING YEAR.	4/30/1993 (Completed)
M-26-01D	SUBMIT AN ANNUAL HANFORD LAND DISPOSAL RESTRICTIONS REPORT IN ACCORDANCE WITH THE LDR PLAN TO COVER THE PERIOD FROM 4-1 OF THE PREVIOUS YEAR THROUGH 3-31 OF THE REPORTING YEAR.	4/30/1994
M-26-01E	SUBMIT AN ANNUAL HANFORD LAND DISPOSAL RESTRICTIONS REPORT IN ACCORDANCE WITH THE LDR PLAN TO COVER THE PERIOD FROM 4-1 OF THE PREVIOUS YEAR TO THROUGH 3-31 OF THE REPORTING YEAR.	4/30/1995
M-26-01F	SUBMIT AN ANNUAL HANFORD LAND DISPOSAL RESTRICTIONS REPORT IN ACCORDANCE WITH THE LDR PLAN TO COVER THE PERIOD FROM 4-1 OF THE PREVIOUS YEAR TO THROUGH 3-31 OF THE REPORTING YEAR.	4/30/1996
M-26-01G	SUBMIT AN ANNUAL HANFORD LAND DISPOSAL RESTRICTIONS REPORT IN ACCORDANCE WITH THE LDR PLAN TO COVER THE PERIOD FROM 4-1 OF THE PREVIOUS YEAR TO THROUGH 3-31 OF THE REPORTING YEAR.	4/30/1997
M-26-01H	SUBMIT AN ANNUAL HANFORD LAND DISPOSAL RESTRICTIONS REPORT IN ACCORDANCE WITH THE LDR PLAN TO COVER THE PERIOD FROM 4-1 OF THE PREVIOUS YEAR TO THROUGH 3-31 OF THE REPORTING YEAR.	4/30/1998
M-26-01I	SUBMIT AN ANNUAL HANFORD LAND DISPOSAL RESTRICTIONS REPORT IN ACCORDANCE WITH THE LDR PLAN TO COVER THE PERIOD FROM 4-1 OF THE PREVIOUS YEAR TO THROUGH 3-31 OF THE REPORTING YEAR.	4/30/1999
M-26-01J	SUBMIT AN ANNUAL HANFORD LAND DISPOSAL RESTRICTIONS REPORT IN ACCORDANCE WITH THE LDR PLAN TO COVER THE PERIOD FROM 4-1 OF THE PREVIOUS YEAR TO THROUGH 3-31 OF THE REPORTING YEAR.	4/30/2000
M-26-02A	ESTABLISH INTERIM MILESTONES FOR LDR COMPLIANCE.	10/31/1990 (Completed)
M-26-02B	ESTABLISH INTERIM MILESTONES FOR LDR COMPLIANCE.	10/31/1991 (Completed)
M-26-02C	ESTABLISH INTERIM MILESTONES FOR LDR COMPLIANCE.	10/31/1992 (Deleted)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-26-03	CEASE DISCHARGE OF 242-A EVAPORATOR PROCESS CONDENSATE EFFLUENT TO LERF UNITS.	12/31/1994
M-26-04	REMOVE ALL HAZARDOUS WASTE RESIDUES FROM THE 242-A EVAPORATOR LERF UNITS.	6/30/1995
M-26-05A	SUBMIT TO EPA AND ECOLOGY AN EVALUATION OF DEVELOPMENT STATUS OF TRITIUM TREATMENT TECHNOLOGY THAT WOULD BE PERTINENT TO THE CLEANUP AND MANAGEMENT OF TRITIATED WASTE WATER (e.g., THE 242-A EVAPORATOR PROCESS CONDENSATE LIQUID EFFLUENT) AND TRITIUM CONTAMINATED GROUNDWATER AT THE HANFORD SITE.	8/31/1994
M-26-05B	SUBMIT TO EPA AND ECOLOGY AN EVALUATION OF DEVELOPMENT STATUS OF TRITIUM TREATMENT TECHNOLOGY THAT WOULD BE PERTINENT TO THE CLEANUP AND MANAGEMENT OF TRITIATED WASTE WATER (e.g., THE 242-A EVAPORATOR PROCESS CONDENSATE LIQUID EFFLUENT) AND TRITIUM CONTAMINATED GROUNDWATER AT THE HANFORD SITE.	8/31/1995
M-26-05C	SUBMIT TO EPA AND ECOLOGY AN EVALUATION OF DEVELOPMENT STATUS OF TRITIUM TREATMENT TECHNOLOGY THAT WOULD BE PERTINENT TO THE CLEANUP AND MANAGEMENT OF TRITIATED WASTE WATER (e.g., THE 242-A EVAPORATOR PROCESS CONDENSATE LIQUID EFFLUENT) AND TRITIUM CONTAMINATED GROUNDWATER AT THE HANFORD SITE.	8/31/1996
M-26-05D	SUBMIT TO EPA AND ECOLOGY AN EVALUATION OF DEVELOPMENT STATUS OF TRITIUM TREATMENT TECHNOLOGY THAT WOULD BE PERTINENT TO THE CLEANUP AND MANAGEMENT OF TRITIATED WASTE WATER (e.g., THE 242-A EVAPORATOR PROCESS CONDENSATE LIQUID EFFLUENT) AND TRITIUM CONTAMINATED GROUNDWATER AT THE HANFORD SITE.	8/31/1997
M-26-05E	SUBMIT TO EPA AND ECOLOGY AN EVALUATION OF DEVELOPMENT STATUS OF TRITIUM TREATMENT TECHNOLOGY THAT WOULD BE PERTINENT TO THE CLEANUP AND MANAGEMENT OF TRITIATED WASTE WATER (e.g., THE 242-A EVAPORATOR PROCESS CONDENSATE LIQUID EFFLUENT) AND TRITIUM CONTAMINATED GROUNDWATER AT THE HANFORD SITE.	8/31/1998
M-26-05F	SUBMIT TO EPA AND ECOLOGY AN EVALUATION OF DEVELOPMENT STATUS OF TRITIUM TREATMENT TECHNOLOGY THAT WOULD BE PERTINENT TO THE CLEANUP AND MANAGEMENT OF TRITIATED WASTE WATER (e.g., THE 242-A EVAPORATOR PROCESS CONDENSATE LIQUID EFFLUENT) AND TRITIUM CONTAMINATED GROUNDWATER AT THE HANFORD SITE.	8/31/1999
M-26-05G	SUBMIT TO EPA AND ECOLOGY AN EVALUATION OF DEVELOPMENT STATUS OF TRITIUM TREATMENT TECHNOLOGY THAT WOULD BE PERTINENT TO THE CLEANUP AND MANAGEMENT OF TRITIATED	8/31/2000

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Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
	WASTE WATER (e.g., THE 242-A EVAPORATOR PROCESS CONDENSATE LIQUID EFFLUENT) AND TRITIUM CONTAMINATED GROUNDWATER AT THE HANFORD SITE.	
M-26-05H	SUBMIT TO EPA AND ECOLOGY AN EVALUATION OF DEVELOPMENT STATUS OF TRITIUM TREATMENT TECHNOLOGY THAT WOULD BE PERTINENT TO THE CLEANUP AND MANAGEMENT OF TRITIATED WASTE WATER (e.g., THE 242-A EVAPORATOR PROCESS CONDENSATE LIQUID EFFLUENT) AND TRITIUM CONTAMINATED GROUNDWATER AT THE HANFORD SITE.	8/31/2001
M-26-05I	SUBMIT TO EPA AND ECOLOGY AN EVALUATION OF DEVELOPMENT STATUS OF TRITIUM TREATMENT TECHNOLOGY THAT WOULD BE PERTINENT TO THE CLEANUP AND MANAGEMENT OF TRITIATED WASTE WATER (e.g., THE 242-A EVAPORATOR PROCESS CONDENSATE LIQUID EFFLUENT) AND TRITIUM CONTAMINATED GROUNDWATER AT THE HANFORD SITE.	8/31/2002
M-26-05J	SUBMIT TO EPA AND ECOLOGY AN EVALUATION OF DEVELOPMENT STATUS OF TRITIUM TREATMENT TECHNOLOGY THAT WOULD BE PERTINENT TO THE CLEANUP AND MANAGEMENT OF TRITIATED WASTE WATER (e.g., THE 242-A EVAPORATOR PROCESS CONDENSATE LIQUID EFFLUENT) AND TRITIUM CONTAMINATED GROUNDWATER AT THE HANFORD SITE.	8/31/2003
M-26-05K	SUBMIT TO EPA AND ECOLOGY AN EVALUATION OF DEVELOPMENT STATUS OF TRITIUM TREATMENT TECHNOLOGY THAT WOULD BE PERTINENT TO THE CLEANUP AND MANAGEMENT OF TRITIATED WASTE WATER (e.g., THE 242-A EVAPORATOR PROCESS CONDENSATE LIQUID EFFLUENT) AND TRITIUM CONTAMINATED GROUNDWATER AT THE HANFORD SITE.	8/31/2004
M-26-05L	SUBMIT TO EPA AND ECOLOGY AN EVALUATION OF DEVELOPMENT STATUS OF TRITIUM TREATMENT TECHNOLOGY THAT WOULD BE PERTINENT TO THE CLEANUP AND MANAGEMENT OF TRITIATED WASTE WATER (e.g., THE 242-A EVAPORATOR PROCESS CONDENSATE LIQUID EFFLUENT) AND TRITIUM CONTAMINATED GROUNDWATER AT THE HANFORD SITE.	8/31/2005
M-26-05M	SUBMIT TO EPA AND ECOLOGY AN EVALUATION OF DEVELOPMENT STATUS OF TRITIUM TREATMENT TECHNOLOGY THAT WOULD BE PERTINENT TO THE CLEANUP AND MANAGEMENT OF TRITIATED WASTE WATER (e.g., THE 242-A EVAPORATOR PROCESS CONDENSATE LIQUID EFFLUENT) AND TRITIUM CONTAMINATED GROUNDWATER AT THE HANFORD SITE.	8/31/2006
M-26-05N	SUBMIT TO EPA AND ECOLOGY AN EVALUATION OF DEVELOPMENT STATUS OF TRITIUM TREATMENT TECHNOLOGY THAT WOULD BE PERTINENT TO THE CLEANUP AND MANAGEMENT OF TRITIATED WASTE WATER (e.g., THE 242-A EVAPORATOR PROCESS CONDENSATE LIQUID EFFLUENT) AND TRITIUM CONTAMINATED GROUNDWATER AT THE HANFORD SITE.	8/31/2007

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-26-050	SUBMIT TO EPA AND ECOLOGY AN EVALUATION OF DEVELOPMENT STATUS OF TRITIUM TREATMENT TECHNOLOGY THAT WOULD BE PERTINENT TO THE CLEANUP AND MANAGEMENT OF TRITIATED WASTE WATER (e.g., THE 242-A EVAPORATOR PROCESS CONDENSATE LIQUID EFFLUENT) AND TRITIUM CONTAMINATED GROUNDWATER AT THE HANFORD SITE.	8/31/2008
M-26-05P	SUBMIT TO EPA AND ECOLOGY AN EVALUATION OF DEVELOPMENT STATUS OF TRITIUM TREATMENT TECHNOLOGY THAT WOULD BE PERTINENT TO THE CLEANUP AND MANAGEMENT OF TRITIATED WASTE WATER (e.g., THE 242-A EVAPORATOR PROCESS CONDENSATE LIQUID EFFLUENT) AND TRITIUM CONTAMINATED GROUNDWATER AT THE HANFORD SITE.	8/31/2009
M-26-05Q	SUBMIT TO EPA AND ECOLOGY AN EVALUATION OF DEVELOPMENT STATUS OF TRITIUM TREATMENT TECHNOLOGY THAT WOULD BE PERTINENT TO THE CLEANUP AND MANAGEMENT OF TRITIATED WASTE WATER (e.g., THE 242-A EVAPORATOR PROCESS CONDENSATE LIQUID EFFLUENT) AND TRITIUM CONTAMINATED GROUNDWATER AT THE HANFORD SITE.	8/31/2010
M-26-05R	SUBMIT TO EPA AND ECOLOGY AN EVALUATION OF DEVELOPMENT STATUS OF TRITIUM TREATMENT TECHNOLOGY THAT WOULD BE PERTINENT TO THE CLEANUP AND MANAGEMENT OF TRITIATED WASTE WATER (e.g., THE 242-A EVAPORATOR PROCESS CONDENSATE LIQUID EFFLUENT) AND TRITIUM CONTAMINATED GROUNDWATER AT THE HANFORD SITE.	8/31/2011
M-26-05S	SUBMIT TO EPA AND ECOLOGY AN EVALUATION OF DEVELOPMENT STATUS OF TRITIUM TREATMENT TECHNOLOGY THAT WOULD BE PERTINENT TO THE CLEANUP AND MANAGEMENT OF TRITIATED WASTE WATER (e.g., THE 242-A EVAPORATOR PROCESS CONDENSATE LIQUID EFFLUENT) AND TRITIUM CONTAMINATED GROUNDWATER AT THE HANFORD SITE.	8/31/2012
M-26-05T	SUBMIT TO EPA AND ECOLOGY AN EVALUATION OF DEVELOPMENT STATUS OF TRITIUM TREATMENT TECHNOLOGY THAT WOULD BE PERTINENT TO THE CLEANUP AND MANAGEMENT OF TRITIATED WASTE WATER (e.g., THE 242-A EVAPORATOR PROCESS CONDENSATE LIQUID EFFLUENT) AND TRITIUM CONTAMINATED GROUNDWATER AT THE HANFORD SITE.	8/31/2013
M-26-05U	SUBMIT TO EPA AND ECOLOGY AN EVALUATION OF DEVELOPMENT STATUS OF TRITIUM TREATMENT TECHNOLOGY THAT WOULD BE PERTINENT TO THE CLEANUP AND MANAGEMENT OF TRITIATED WASTE WATER (e.g., THE 242-A EVAPORATOR PROCESS CONDENSATE LIQUID EFFLUENT) AND TRITIUM CONTAMINATED GROUNDWATER AT THE HANFORD SITE.	8/31/2014
M-26-05V	SUBMIT TO EPA AND ECOLOGY AN EVALUATION OF DEVELOPMENT STATUS OF TRITIUM TREATMENT TECHNOLOGY THAT WOULD BE PERTINENT TO THE CLEANUP AND MANAGEMENT OF TRITIATED	8/31/2015

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
	WASTE WATER (e.g., THE 242-A EVAPORATOR PROCESS CONDENSATE LIQUID EFFLUENT) AND TRITIUM CONTAMINATED GROUNDWATER AT THE HANFORD SITE.	
M-26-05W	SUBMIT TO EPA AND ECOLOGY AN EVALUATION OF DEVELOPMENT STATUS OF TRITIUM TREATMENT TECHNOLOGY THAT WOULD BE PERTINENT TO THE CLEANUP AND MANAGEMENT OF TRITIATED WASTE WATER (e.g., THE 242-A EVAPORATOR PROCESS CONDENSATE LIQUID EFFLUENT) AND TRITIUM CONTAMINATED GROUNDWATER AT THE HANFORD SITE.	8/31/2016
M-26-05X	SUBMIT TO EPA AND ECOLOGY AN EVALUATION OF DEVELOPMENT STATUS OF TRITIUM TREATMENT TECHNOLOGY THAT WOULD BE PERTINENT TO THE CLEANUP AND MANAGEMENT OF TRITIATED WASTE WATER (e.g., THE 242-A EVAPORATOR PROCESS CONDENSATE LIQUID EFFLUENT) AND TRITIUM CONTAMINATED GROUNDWATER AT THE HANFORD SITE.	8/31/2017
M-26-05Y	SUBMIT TO EPA AND ECOLOGY AN EVALUATION OF DEVELOPMENT STATUS OF TRITIUM TREATMENT TECHNOLOGY THAT WOULD BE PERTINENT TO THE CLEANUP AND MANAGEMENT OF TRITIATED WASTE WATER (e.g., THE 242-A EVAPORATOR PROCESS CONDENSATE LIQUID EFFLUENT) AND TRITIUM CONTAMINATED GROUNDWATER AT THE HANFORD SITE.	8/31/2018
M-26-05Z	SUBMIT TO EPA AND ECOLOGY AN EVALUATION OF DEVELOPMENT STATUS OF TRITIUM TREATMENT TECHNOLOGY THAT WOULD BE PERTINENT TO THE CLEANUP AND MANAGEMENT OF TRITIATED WASTE WATER (e.g., THE 242-A EVAPORATOR PROCESS CONDENSATE LIQUID EFFLUENT) AND TRITIUM CONTAMINATED GROUNDWATER AT THE HANFORD SITE.	8/31/2019
M-27-00	SUBMIT ALL AGGREGATE AREA MANAGEMENT STUDY REPORTS (AAMSR) FOR THE 200 AREA TO EPA AND ECOLOGY AS SECONDARY DOCUMENTS. THESE DOCUMENTS SHALL BE PREPARED IN ACCORDANCE WITH THE OBJECTIVES OF THE "HANFORD PAST-PRACTICE INVESTIGATION STRATEGY" AND THE OUTLINES PROVIDED IN THE "200-AREA AGGREGATE AREA MANAGEMENT STUDY GUIDELINES", BOTH OF WHICH ARE INCLUDED IN APPENDIX F.	9/30/1992 (Completed)
M-27-01	SUBMIT METHODOLOGY AND FORMAT FOR AAMSR (TO BE INCLUDED AS CHAPTER 1 OF EACH AAMSR) TO EPA AND ECOLOGY AS SECONDARY DOCUMENT.	6/30/1991 (Completed)
M-27-02	SUBMIT AAMSR FOR U-PLANT WASTE MANAGEMENT AREA (FOR ALL SOURCE TERM OPERABLE UNITS WITH "200-UP" DESIGNATIONS).	1/31/1992 (Completed)
M-27-03	SUBMIT AAMSR FOR Z-PLANT WASTE MANAGEMENT AREA (FOR ALL SOURCE TERM OPERABLE UNITS WITH 200-ZP" DESIGNATIONS).	2/28/1992 (Completed)
M-27-04	SUBMIT AAMSR FOR REDOX WASTE MANAGEMENT AREA (FOR ALL SOURCE TERM OPERABLE UNITS WITH "200-RO" DESIGNATIONS).	3/31/1992 (Completed)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-27-05	SUBMIT AAMSR FOR T-PLANT WASTE MANAGEMENT AREA (FOR ALL SOURCE TERM OPERABLE UNITS WITH "200-TP" DESIGNATIONS AND FOR OPERABLE UNIT 200-SS-2).	4/30/1992 (Completed)
M-27-06	SUBMIT AAMSR FOR PUREX WASTE MANAGEMENT AREA (FOR ALL SOURCE TERM OPERABLE UNITS WITH "200-PO" DESIGNATIONS).	5/31/1992 (Completed)
M-27-07	SUBMIT AAMSR FOR B-PLANT WASTE MANAGEMENT AREA (FOR ALL SOURCE TERM OPERABLE UNITS WITH "200-BP" DESIGNATIONS [EXCEPT THE 200-BP-1 OPERABLE UNIT] AND FOR OPERABLE UNITS 200-SS-1 AND 200-IU-6).	6/30/1992 (Completed)
M-27-08	SUBMIT AAMSR FOR SEMI-WORKS WASTE MANAGEMENT AREA (FOR ALL SOURCE TERM OPERABLE UNITS WITH "200-SO" DESIGNATIONS).	7/31/1992 (Completed)
M-27-09	SUBMIT AAMSR FOR 200-NORTH WASTE MANAGEMENT AREA (FOR ALL OPERABLE UNITS WITH "200-NO" DESIGNATIONS, INCLUDING GROUNDWATER IMPACTED BY THE SOURCE TERMS).	8/31/1992 (Completed)
M-27-10	SUBMIT AAMSR FOR 200-WEST GROUNDWATER AGGREGATE AREA, INCLUDING ALL GROUNDWATER IMPACTED BY THE 200-WEST AREA SOURCE TERM OPERABLE UNITS.	9/30/1992 (Completed)
M-27-11	SUBMIT AAMSR FOR 200-EAST GROUNDWATER AGGREGATE AREA, INCLUDING ALL GROUNDWATER IMPACTED BY THE 200-EAST AREA SOURCE TERM OPERABLE UNITS.	9/30/1992 (Completed)
M-28-00	SUBMIT ALL SOILS AND GROUNDWATER BACKGROUND DETERMINATION DOCUMENTS TO EPA AND ECOLOGY.	4/30/1992 (Completed)
M-28-01	SUBMIT SOILS BACKGROUND SAMPLING AND ANALYSIS PLAN AND QUALITY ASSURANCE PROJECT PLAN (SECONDARY DOCUMENT).	6/30/1991 (Completed)
M-28-02	SUBMIT BACKGROUND METHODOLOGY DESCRIPTION DOCUMENT FOR SOILS AND GROUNDWATER (SECONDARY DOCUMENT).	7/31/1991 (Completed)
M-28-03	SUBMIT SOILS STUDY REPORT (PRIMARY DOCUMENT), ESTABLISHING BACKGROUND VALUES FOR SOIL AT THE HANFORD SITE AND INCLUDE REPORT IN APPENDIX F.	4/30/1992 (Completed)
M-28-04	SUBMIT EVALUATION REPORT ON EXISTING GROUNDWATER DATA (PRIMARY DOCUMENT) ESTABLISHING BACKGROUND VALUES FOR GROUNDWATER AT THE HANFORD SITE AND INCLUDE REPORT IN APPENDIX F.	4/30/1992 (Completed)
M-29-00	DEVELOP AND SUBMIT DOCUMENTATION TO EPA AND ECOLOGY DESCRIBING HANFORD RISK ASSESSMENT METHODOLOGY.	3/31/1992 (Completed)
M-29-01	IDENTIFY AND SUBMIT DESCRIPTIONS OF CODES AND MODELS (SECONDARY DOCUMENT) TO BE USED IN RISK ASSESSMENT.	9/30/1991 (Completed)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-29-02	SUBMIT A PLAN FOR DEVELOPMENT OF AREA WIDE GROUNDWATER MODELS TO SUPPORT RISK ASSESSMENT AND TO EVALUATE IMPACTS OF CHANGING GROUNDWATER FLOW FIELDS (SECONDARY DOCUMENT).	12/31/1991 (Completed)
M-29-03	SUBMIT RISK ASSESSMENT METHODOLOGY DOCUMENT (PRIMARY DOCUMENT) AND INCLUDE DOCUMENT IN APPENDIX F.	3/31/1992 (Completed)
M-30-00	COMPLETE INTEGRATED GENERAL INVESTIGATIONS AND STUDIES FOR 100-AREA.	9/30/1993 (Completed)
M-30-01	SUBMIT A REPORT (SECONDARY DOCUMENT) TO EPA AND ECOLOGY EVALUATING THE IMPACT TO THE COLUMBIA RIVER FROM CONTAMINATED SPRINGS AND SEEPS, AS DESCRIBED IN THE OPERABLE UNIT WORK PLANS LISTED IN M-30-03.	2/28/1992 (Completed)
M-30-02	SUBMIT A PLAN (PRIMARY DOCUMENT) TO EPA AND ECOLOGY TO DETERMINE CUMULATIVE HEALTH AND ENVIRONMENTAL IMPACTS TO THE COLUMBIA RIVER, INCORPORATING RESULTS OBTAINED UNDER M-30-01.	5/31/1992 (Completed)
M-30-03	COMPLETE ALL NONINTRUSIVE FIELD WORK AS IDENTIFIED IN DRAFT WORK PLANS FOR THE FOLLOWING OPERABLE UNIT WORK PLANS: 100-HR-1, 100-HR-3, 100-DR-1, 100-BC-1, 100-BC-5, 100-KR-1, 100-KR-4, 100-NR-1, 100-NR-3, 100-FR-1, AND 100-FR-3.	9/30/1992 (Completed)
M-30-04	SUBMIT A REPORT (SECONDARY DOCUMENT) TO EPA AND ECOLOGY EVALUATING THE INTERACTION OF COLUMBIA RIVER AND UNCONFINED AQUIFER FOR AQUIFER HYDRAULIC PARAMETERS.	9/30/1992 (Completed)
M-30-05	INSTALL ALL FIELD INSTRUMENTATION AND INITIATE MONITORING ACTIVITIES NECESSARY TO PERFORM LONG-TERM EVALUATION OF COLUMBIA RIVER AND THE UNCONFINED AQUIFER INTERACTION, IN ACCORDANCE WITH THE TASKS IN O.U. WORK PLANS LISTED IN M-30-03.	9/30/1993 (Completed)
M-31-00	PROVIDE ADDITIONAL DOUBLE-SHELL TANK CAPACITY. CONSTRUCTION COMPLETE.	9/30/2018 (Deleted)
M-31-01	COMPLETE CONCEPTUAL DESIGN REPORTS (CDR) FOR UP TO FOUR (4) TANKS.	9/30/1992 (Completed)
M-31-01-T01	INITIATE PERMITTING STRATEGY DISCUSSION BETWEEN TRI-PARTY AGREEMENT SIGNATORIES.	3/31/1992 (Completed)
M-31-02	RECOMMEND ADDITIONAL DOUBLE-SHELL TANK MILESTONE(S).	9/30/1992 (Deleted)
M-31-02-T01	COMPLETE DETAILED DESIGN FOR FIRST NEW TANKS.	2/28/1995 (Deleted)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-31-02-T02	CONSTRUCTION START OF FIRST NEW TANKS	10/31/1995 (Deleted)
M-31-02-T03	PROVIDE ADDITIONAL DOUBLE-SHELL TANK CAPACITY. CONSTRUCTION COMPLETE FOR FIRST NEW TANKS	6/30/1999 (Deleted)
M-31-03	INITIATE DEFINITIVE DESIGN OF NEW MULTI-FUNCTION WASTE TANK FACILITY.	1/31/1993 (Completed)
M-32-00	COMPLETE IDENTIFIED DANGEROUS WASTE TANK CORRECTIVE ACTIONS.	9/30/1999
	<p>COMPLETION OF INTERIM MILESTONE TASKS MAY IDENTIFY THE NEED FOR ADDITIONAL ACTIONS OR INTERIM MILESTONES IN THE FUTURE. THE REPORTS AND DEFICIENCY CORRECTION SCHEDULES PREPARED TO SATISFY MILESTONES WILL BE USED TO IDENTIFY ANY APPROPRIATE NEW INTERIM MILESTONES. ANY NEW INTERIM MILESTONES WILL SUBSEQUENTLY BE ESTABLISHED VIA THE CHANGE PROCESS IN SECTION 12 OF THE ACTION PLAN.</p> <p>TANK INTEGRITY ASSESSMENTS WILL NOT BE REQUIRED FOR TERMINAL CLEANOUT OF THE PLUTONIUM-URANIUM EXTRACTION PLANT, EXCEPT FOR TANKS F18, U3, AND U4. INTEGRITY ASSESSMENTS FOR TANKS F18, U3, AND U4 HAVE BEEN COMPLETED.</p>	
M-32-01	COMPLETE PLUTONIUM FINISHING PLANT (PFP) TANK INTERIM STATUS ACTIONS.	12/31/1994
	<p>STABILIZATION ACTIVITIES AT THE PLUTONIUM FINISHING PLANT (PFP), DEPENDENT ON EVALUATION OF ALTERNATIVES UNDER THE NATIONAL ENVIRONMENTAL POLICY ACT, WILL BE LIMITED TO A LIQUID WASTE GENERATION OF 300,000 GALLONS OR LESS TO THE 241-Z TANK SYSTEM. THE WASTE IS TEMPORARILY STORED IN THE 241-Z TANK SYSTEM PRIOR TO TRANSFER TO THE DOUBLE-SHELL TANK FARMS. FOLLOWING ANY SUCH STABILIZATION ACTIVITY, THE PFP WILL NOT INITIATE ANY ADDITIONAL MISSION(S), EXCEPT AS DESCRIBED BELOW, THAT RESULTS IN THE DISCHARGE OF WASTE TO THE 241-Z TANKS PRIOR TO COMPLETION OF TANK SYSTEM UPGRADES NECESSARY FOR COMPLIANCE WITH STATE AND FEDERAL DANGEROUS WASTE REGULATIONS.</p> <p>GLOVE-BOX SCALE, LABORATORY, PLANT MAINTENANCE, AND MISCELLANEOUS SUPPORT ACTIVITIES NECESSARY FOR THE SAFE, SECURE STORAGE OF MATERIALS AND PROTECTION OF PERSONNEL AND THE ENVIRONMENT WILL CONTINUE. WITH EXCEPTION OF THE STABILIZATION ACTIVITIES, DISCHARGE TO 241-Z WILL BE LIMITED TO 50,000 GALLONS PER YEAR UNTIL COMPLIANCE IS ACHIEVED OR TERMINAL CLEANOUT IS COMPLETED. ANY TERMINAL CLEANOUT DISCHARGE</p>	



Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
	REQUIREMENTS IN EXCESS OF 50,000 GALLONS PER YEAR WILL BE REVIEWED AND APPROVED BY THE THREE PARTIES PRIOR TO IMPLEMENTATION.	
M-32-01-T01	COMPLETE AND SUBMIT INTEGRITY ASSESSMENT REPORT FOR PFP INTERIM STATUS TANK SYSTEM. PROVIDE A SCHEDULE TO ADDRESS ANY DEFICIENCIES DESCRIBED IN THE REPORT RELATED TO TANK SYSTEM COMPLIANCE (DEFICIENCIES NOT ADDRESSED IN THIS SCHEDULE WILL BE ADDRESSED IN THE COMPLIANCE STRATEGY OF TARGET ACTION M-32-01-T02).	10/31/1993 (Completed)
M-32-01-T02	SUBMIT PROPOSED COMPLIANCE STRATEGY FOR REMAINING DANGEROUS WASTE TANK SYSTEM ISSUES.	6/30/1994
M-32-01-T03	COMPLETE CONSTRUCTION OF PIPING UPGRADES BETWEEN 234-SZ, 236-Z AND 241-Z TANK SYSTEM (PROJECT C-031H).	12/31/1994
M-32-02	COMPLETE 219-S TANK INTERIM STATUS ACTIONS.	9/30/1997
M-32-02-T01	PROVIDE NOTIFICATION OF COMPLETION OF DEFINITIVE DESIGN FOR PROJECT W-178 - CONSTRUCTION OF INTERIM STATUS TANK SYSTEM UPGRADES FOR 219-S TANK SYSTEM.	1/31/1996
M-32-02-T02	UPGRADE EXISTING TRANSFER LINES TO MEET SECONDARY CONTAINMENT REQUIREMENTS.	9/30/1997
M-32-03	COMPLETE T PLANT TANK ACTIONS.	9/30/1999
M-32-03-T01	IMPLEMENT PERIODIC VISUAL INSPECTION AND STATIC LEAK TEST PROGRAM FOR 2706-T AND 211-T TANKS.	10/31/1993 (Completed)
M-32-03-T02	COMPLETE CONCEPTUAL DESIGN REPORT (PROJECT W-259) FOR T PLANT TANK SYSTEM UPGRADES.	4/30/1994
M-32-03-T03	SUBMIT SCHEDULE FOR COMPLETION OF T PLANT TANK SYSTEM UPGRADES (PROJECT W-259).	6/30/1994
M-32-03-T04	COMPLETE MODIFICATION OF 2706-T STAGING PAD TO ELIMINATE ACCUMULATION OF PRECIPITATION.	6/30/1994
M-32-03-T05	INSTALL LEVEL INDICATION DEVICE FOR 211-T TANK.	6/30/1994
M-32-03-T06	COMPLETE SCHEDULED UPGRADES TO T PLANT TANK SYSTEM (PROJECT W-259).	9/30/1999
M-32-04	COMPLETE DOUBLE-SHELL TANK INTERIM STATUS TANK ACTIONS.	6/30/1994
M-32-04-T01	SUBMIT DESIGN STANDARDS REVIEW FOR ONE TANK FARM.	9/30/1993 (Completed)
M-32-04-T02	PREPARE AND SUBMIT REPORT DOCUMENTING NON-DESTRUCTIVE EXAMINATION EQUIPMENT DEVELOPMENT AND IMPLEMENTATION PLANS.	9/30/1993 (Completed)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-32-04-T03	COMPLETE ALL DST VISUAL EXAMINATION AND PREPARE AND SUBMIT REPORTS.	9/30/1993 (Completed)
M-32-04-T04	COMPLETE AND SUBMIT THE TRANSFER FACILITY COMPLIANCE PLAN.	6/30/1994
M-32-04-T05	SUBMIT TO ECOLOGY A FINAL PLAN AND SCHEDULE FOR COMPLETION OF THE DOUBLE-SHELL TANK INTEGRITY ASSESSMENTS.	6/30/1994
M-32-05	COMPLETE 242-A EVAPORATOR INTERIM STATUS TANK ACTIONS.	TBD
M-32-05-T01	COMPLETE AND SUBMIT INTEGRITY ASSESSMENT REPORT FOR THE 242-A EVAPORATOR INTERIM STATUS TANK SYSTEM. PROVIDE A SCHEDULE TO ADDRESS ANY DEFICIENCIES DESCRIBED IN THE REPORT RELATED TO TANK SYSTEM COMPLIANCE.	TBD
M-32-06	COMPLETE 244-AR VAULT INTERIM STATUS TANK ACTIONS.	TBD
M-32-06-T01	COMPLETE AND SUBMIT INTEGRITY ASSESSMENT REPORT AND IDENTIFIED UPGRADES FOR 244-AR VAULT INTERIM STATUS TANK SYSTEM (EXCEPT THAT DST TRANSFER LINES THAT PENETRATE THE 244-AR VAULT WILL CONTINUE TO BE USED). PROVIDE A SCHEDULE TO ADDRESS ANY DEFICIENCIES DESCRIBED IN THE REPORT RELATED TO TANK SYSTEM COMPLIANCE.	TBD
M-32-07	COMPLETE B PLANT INTERIM STATUS TANK ACTIONS.	12/31/1995
M-32-07-T01	IDENTIFY ADDITIONAL DANGEROUS WASTE TANKS AND ANCILLARY EQUIPMENT THAT WILL BE ROUTINELY USED DURING CLEANOUT AND STABILIZATION ACTIVITIES. SUBMIT SCHEDULE TO PERFORM INTEGRITY ASSESSMENTS ON IDENTIFIED ADDITIONAL DANGEROUS WASTE TANKS AND ANCILLARY EQUIPMENT.  B PLANT WILL NOT ACCEPT ANY WASTE FOR TREATMENT, EXCEPT WASTE GENERATED AS A RESULT OF ON-GOING B PLANT/WESF OPERATIONS, WITHOUT COMPLETION OF TANK INTEGRITY ASSESSMENTS AND COMPLETION OF UPGRADES NECESSARY FOR COMPLIANCE WITH WAC 173-303-640 OR AN APPLICABLE PERMIT ON SYSTEMS USED FOR THE TREATMENT, STORAGE OR DISPOSAL OF THE WASTE.	4/30/1994
M-32-07-T02	COMPLETE AND SUBMIT INTEGRITY ASSESSMENT PLAN FOR TANKS 25-1, 25-2, 23-1, CONCENTRATOR E-23-3, AND IDENTIFIED ANCILLARY EQUIPMENT.	10/31/1994
M-32-07-T03	COMPLETE AND SUBMIT INTEGRITY ASSESSMENT REPORT FOR TANKS 25-1, 25-2, 23-1, CONCENTRATOR E-23-3, AND ANCILLARY EQUIPMENT AS IDENTIFIED IN THE INTEGRITY ASSESSMENT PLAN. PROVIDE A SCHEDULE TO ADDRESS ANY DEFICIENCIES DESCRIBED IN THE REPORT RELATED TO TANK SYSTEM COMPLIANCE.	12/31/1995

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
	THE INTEGRITY ASSESSMENT REPORT OF THE LOW LEVEL WASTE CONCENTRATOR, E-23-3, AND THE CONCENTRATED WASTE RECEIVER, TK-23-1, WILL BE COMPLETED ONLY IF THEIR OPERATION IS PLANNED BEYOND DECEMBER 1995. THE DETERMINATION TO INCLUDE THESE TWO TANKS IN THE INTEGRITY ASSESSMENT REPORT WILL BE MADE BY OCTOBER 1994.	
M-32-08	COMPLETE GROUT INTERIM STATUS TANK ACTIONS.	TBD
M-32-08-T01	COMPLETE AND SUBMIT INTEGRITY ASSESSMENT REPORT FOR GROUT INTERIM STATUS TANK SYSTEM. COMPLETE ACTIVITIES REQUIRED TO CORRECT ANY DEFICIENCIES DESCRIBED IN THE REPORT RELATED TO TANK SYSTEM COMPLIANCE.	TBD
M-33-00	SUBMIT A DOE-SIGNED CHANGE PACKAGE FOR ACQUISITION OF NEW FACILITIES, MODIFICATION OF EXISTING FACILITIES, OR MODIFICATION OF PLANNED FACILITIES FOR STORAGE, PROCESSING AND/OR DISPOSAL OF SOLID WASTE AND MATERIALS BASED UPON THE RESULTS OF THE "SITE-WIDE SYSTEMS ANALYSIS."	6/30/1995
M-33-00-T01	COMPLETE SOLID MATERIAL AND WASTES FUNCTIONAL ANALYSIS FOR INPUT TO THE "SITE-WIDE SYSTEM ANALYSIS".	1/31/1994 (Completed)
M-33-00-T02	COMPLETE DRAFT "SITE-WIDE SYSTEMS ANALYSIS" INCLUDING REQUIREMENTS FOR SOLID MATERIAL AND WASTES PROCESSING AND STORAGE.	7/31/1994
M-33-00-T03	ISSUE FINAL "SITE-WIDE SYSTEMS ANALYSIS".	1/31/1995
M-33-00-T04	PROPOSE ADDITIONAL MILESTONES, AS REQUIRED, FOR ACQUISITION OF NEW FACILITIES, MODIFICATION OF EXISTING FACILITIES, OR MODIFICATION OF PLANNED FACILITIES' SCOPE FOR STORAGE, PROCESSING AND/OR DISPOSAL OF SOLID WASTE AND MATERIALS. THESE PROPOSED ADDITIONAL MILESTONES WILL BE BASED UPON THE RESULTS OF THE "SITE-WIDE SYSTEMS ANALYSIS".	6/30/1995
M-34-00	COMPLETE ACTIONS SPECIFIED BY AGREED INTERIM MILESTONES RELATED TO REMEDIATION OF THE K-EAST BASINS.	TBD
M-34-00-T01	ISSUE NOTICE OF INTENT FOR N-REACTOR FUEL EIS.	6/30/1994
M-34-00-T02	INITIATE K-EAST BASIN FUEL ENCAPSULATION.	6/30/1994
M-34-00-T03	SUBMIT AN ENGINEERING STUDY TO DETERMINE THE FEASIBILITY OF MOVING AND TEMPORARILY STORING K-EAST FUEL AND SLUDGE (ONCE ENCAPSULATED) TO THE K-WEST BASIN.	9/30/1994

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-34-00-T04	SUBMIT A SCHEDULE DESCRIBING ACTIVITIES FOR THE FINAL DISPOSITION OF CONTAMINATED K-EAST BASIN WATER FOR PLANNING PURPOSES TO SUPPORT THE 100-KR-4 RECORD OF DECISION.	10/31/1994
M-34-00-T05	DOE SHALL PROVIDE A SCHEDULE FOR FUEL AND SLUDGE ENCAPSULATION AND CONTAMINATED WATER REMOVAL OR REPLACEMENT TO ECOLOGY AND EPA THAT SUPPORTS THE TPA MILESTONE.	3/31/1995
M-34-00-T06	INITIATE K-EAST BASIN SLUDGE ENCAPSULATION.	6/30/1996
M-34-00-T07	COMPLETE ENCAPSULATION OF THE FUEL AND SLUDGE WITHIN K-EAST BASIN.	12/31/1998
M-34-00-T08	REMOVE ALL FUEL AND SLUDGE FROM BOTH K-EAST AND K-WEST BASINS IN AN ENCAPSULATED FORM.	12/31/2002
M-34-01	<p>CONTAMINATED K-EAST BASIN WATER WILL BE REMOVED, REPLACED, OR TREATED. THE TIMING OF THIS ACTION MUST BE COORDINATED WITH ENCAPSULATION AND THE CLEANING OF THE RESIDUAL CONTAMINATION IN THE BASIN AND (AS NOTED BELOW) THE ALTERNATIVE SELECTION IS DEPENDANT ON THE FEASIBILITY OF MOVING ENCAPSULATED K-EAST BASIN FUEL AND SLUDGE TO THE K-WEST BASIN. THE CONTAMINATED WATER WILL BE DISPOSITIONED IN ACCORDANCE WITH REASONABLE AVAILABLE HANFORD SITE TREATMENT AND/OR DISPOSAL PROCESSES AND METHODS, AVAILABLE AT THE TIME OF THIS ACTION. UNLESS A BETTER OPTION BECOMES AVAILABLE, THE WATER WILL BE TRUCKED TO C-018 FOR DISPOSAL.</p> <p>IF THE K-EAST FUEL AND SLUDGE, ONCE ENCAPSULATED, CAN BE MOVED TO THE K-WEST BASIN (DETERMINED THROUGH A SEPTEMBER 1994 ENGINEERING STUDY TARGET DATE) THE REMOVAL AND DISPOSAL OF THE CONTAMINATED WATER SHALL BE COMPLETED BY SEPTEMBER 2000. THIS DATE IS AN EIGHTEEN MONTH ACTION, STARTING IN MARCH 1999, THREE MONTHS AFTER FUEL AND SLUDGE ENCAPSULATION IS COMPLETED. IF THE TRANSFER OF ENCAPSULATED K-EAST BASIN FUEL AND SLUDGE TO K-WEST BASIN IS INFEASIBLE, CONTAMINATED K-EAST BASIN WATER WILL BE REPLACED BY FRESH WATER, STARTING IN SEPTEMBER, 1996 AT A RATE OF TWO MILLION GALLONS/YEAR AND WILL CONTINUE UNTIL SUCH TIME THAT THE TRITIUM CONCENTRATION IN THE BASIN IS DECREASED AND IS MAINTAINED AT OR BELOW 300,000 pCi/L (THE GOAL IS TO REDUCE THE TRITIUM CONCENTRATION IN THE BASIN SUCH THAT RESULTING GROUNDWATER TRITIUM CONCENTRATION MEET DRINKING WATER CONCENTRATION STANDARDS, RECOGNIZING A LAG BETWEEN BASIN AND GROUNDWATER CONCENTRATIONS.</p>	TBD
M-34-02	INITIATED NEGOTIATIONS WITH ECOLOGY AND EPA ON INCORPORATION OF TRANSITION ACTIVITIES INCLUDING STABILIZATION OF THE BASINS, CONSISTENT WITH SECTION	6/30/1996

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
	3.1 OF THE AGREEMENT (AS AMENDED) AND THE RECORD OF DECISION REGARDING LONG-TERM STORAGE AND ULTIMATE DISPOSITION OF THE IRRADIATED FUEL. DOE WILL SUBMIT A SIGNED TRI-PARTY AGREEMENT CHANGE REQUEST PROPOSING MILESTONES FOR (1) THE COMPLETION OF REMOVAL OF FUEL AND SLUDGES FROM THE K-BASINS AND (2) THE COMPLETION OF STABILIZATION OF THE BASINS.	
M-35-00	COMPLETE DATA MANAGEMENT ENHANCEMENTS AS NEGOTIATED AND APPROVED IN M-35-00 INTERIM MILESTONES.	TBD
M-35-01	LABORATORY ANALYTICAL DATA DEVELOPED FROM SST AND DST CHARACTERIZATION, AS REQUIRED BY MILESTONE M-44, WILL BE PROVIDED TO EPA AND ECOLOGY VIA OFFSITE ELECTRONIC DATABASE ACCESS WITH THE FOLLOWING CHARACTERISTICS: - DIRECT HIGH SPEED ACCESS VIA T-1 DATALINK OR DIRECT LAN CONNECTION. - READ, TABLE CREATION, AND DOWNLOADING CAPABILITY IN THE TCD AND/OR TWINS. - USER WILL BE PROVIDED 40 MB OF USER DISK SPACE FOR STORAGE AND MANIPULATION OF TANK DATA.	4/30/1994
M-35-02	DOE SHALL DEVELOP AND SUBMIT TO THE REGULATORS A "TPA STRATEGIC DATA MANAGEMENT PLAN" AS A PRIMARY DOCUMENT WHICH WILL INCLUDE OR ADDRESS THE ITEMS LISTED BELOW:  A. IDENTIFICATION OF TPA RELATED DATA, TPA DATA USERS, PURPOSES OF DATA USE, INFORMATION TO BE INDEXED AND ACCESSED, AND AN IMPLEMENTATION SCHEDULE.  B. SITE STANDARDS FOR DATA MANAGEMENT, GIS SPATIAL DATA, LOCATIONAL DATA COLLECTION, ETC.  C. DATA MANAGEMENT ORGANIZATIONAL STRUCTURE TO IMPLEMENT THE PROCESSES DEFINED IN THIS PLAN.  D. THE FOLLOWING TEN DATA MANAGEMENT INITIATIVES WILL BE EVALUATED AND WHERE APPROPRIATE IMPLEMENTATION ACTIONS AND SCHEDULES WILL BE INCLUDED IN THE STRATEGIC DATA MANAGEMENT PLAN. THE INITIATIVES ARE: - LOCATIONAL DATA COLLECTION STANDARDS - DATABASE DOCUMENTATION AND LISTING OF EXISTING SYSTEMS UPDATE - DATA REFERENCE SEARCH INFORMATION SYSTEM - EII PROCEDURES UPDATE - DIGITAL GIS BASE MAP DATA COLLECTION - SITEWIDE ORTHOPHOTOGRAPHY PROGRAM - MONUMENT CONTROL NETWORK SYSTEM - ENGINEERING SURVEY DATA COLLECTION STANDARDS - STANDARD WELL ID/NAMING AND LOCATION COORDINATES - HISTORICAL DATA MANAGEMENT.	9/30/1994

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
	AN AGREED UPON DESCRIPTION IS DOCUMENTED UNDER "PURPOSE" FOR EACH OF THESE INITIATIVES IN ATTACHMENT XX, DATA MANAGEMENT INITIATIVES, DATED SEPTEMBER 20, 1993.	
M-35-03	DEVELOP AND SUBMIT TO THE REGULATORS DATA MANAGEMENT PLANS FOR EACH DOE-RL PROGRAM OFFICE (ER, WM, TWRS).	3/31/1995
M-35-04	DOE SUBMIT A SIGNED CHANGE PACKAGE WITH MAJOR AND INTERIM MILESTONES AND TARGETS DATES FOR DATA MANAGEMENT INITIATIVES IN THE STRATEGIC DATA MANAGEMENT PLAN.	1/31/1995
M-40-00	MITIGATE/RESOLVE TANK SAFETY ISSUES FOR HIGH PRIORITY WATCH LIST TANKS.  HIGH PRIORITY WATCH LIST TANKS ARE THOSE SINGLE-SHELL AND DOUBLE-SHELL TANKS IDENTIFIED, IN ACCORDANCE WITH SECTION 3137 OF PUBLIC LAW 101-510, WHICH HAVE A SERIOUS POTENTIAL FOR RELEASE OF HIGH-LEVEL WASTE DUE TO UNCONTROLLED INCREASES IN TEMPERATURE OR PRESSURE. THESE INCLUDE FLAMMABLE GAS GENERATING TANKS, FERROCYANIDE CONTAINING TANKS, ORGANIC/NITRATE CONTAINING TANKS, AND A HIGH HEAT PRODUCING TANK. CORRECTIVE ACTION STRATEGIES WILL BE DEVELOPED FOR THESE TANKS. THIS MILESTONE WILL BE COMPLETE WHEN MITIGATION ACTIVITIES, IF REQUIRED, HAVE BEEN IMPLEMENTED IN ALL WATCH LIST TANKS TO ENSURE SAFE STORAGE OF WASTE DURING THE INTERIM PERIOD UNTIL RETRIEVAL FOR TREATMENT AND/OR DISPOSAL OPERATIONS BEGIN. FOR THOSE SAFETY ISSUES MITIGATED PURSUANT TO THIS MILESTONE, SAFETY RESOLUTION WILL BE DEPENDENT UPON FINAL TREATMENT OF THE WASTE. MITIGATION WILL ALLOW, HOWEVER, THE CHARACTERIZATION RETRIEVAL, ETC., OF THESE WASTES PRIOR TO FINAL TREATMENT. SOME SAFETY ISSUES MAY ALSO BE RESOLVED IF (1) RESOLUTION OUT-OF-TANK IS NOT REQUIRED, OR (2) RESOLUTION OUT-OF-TANK WITH OR WITHOUT TREATMENT TAKES PLACE WITHIN THE TIME PERIOD OF THIS MILESTONE.  THIS MILESTONE WILL BE REVIEWED ON AN ANNUAL BASIS TO IDENTIFY ANY POTENTIAL SCHEDULE ENHANCEMENTS.	9/30/2001
M-40-01	COMPLETE TANK 241-SY-101 LOW SPEED MIXER PUMP TEST.  A MIXER PUMP WAS INSTALLED IN TANK 241-SY-101 DURING WINDOW I IN JULY OF 1993. AFTER PUMP INSTALLATION, PERFORM PUMP BUMPING FOLLOWED BY LIMITED, LOW SPEED TESTING (PHASE A AND B) TO DETERMINE WHETHER MIXING CAN BE DONE SAFELY AND WHETHER IT IS EFFECTIVE IN RELEASING HYDROGEN FROM THE WASTE. THE LOW SPEED TEST RESULTS WILL BE ANALYZED TO EVALUATE THE EFFECTIVENESS OF MITIGATING THE FLAMMABLE GAS RETENTION AND LARGE	3/31/1994

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
	EPISODIC GAS RELEASES FROM TANK 241-SY-101. A REPORT WILL BE PREPARED, CLEARED FOR PUBLIC RELEASE AND TRANSMITTED TO RL FOR SUBSEQUENT ISSUANCE TO THE WASHINGTON DEPARTMENT OF ECOLOGY AND ENVIRONMENTAL PROTECTION AGENCY.	
M-40-02	UPGRADE TEMPERATURE MONITORING CAPABILITIES IN FERROCYANIDE TANKS.	4/30/1995
	INSTALL AND OPERATE UPGRADED TEMPERATURE MONITORING CAPABILITIES IN FERROCYANIDE TANKS. THIS UPGRADED MONITORING CAPABILITY SHALL PROVIDE SUFFICIENT DATA ON THE TEMPERATURE CHARACTERISTICS OF THE TANKS TO MEET SAFETY REQUIREMENTS. THE INSTALLATION OF UPGRADED TEMPERATURE MONITORING IN FERROCYANIDE TANKS WILL ALLOW CONTINUED OPERATIONS OF THE TANKS. THIS WORK WILL PROVIDE NEEDED TEMPERATURE INFORMATION SO THAT OPERATING SAFETY PARAMETERS CAN BE ASSESSED FOR THE FERROCYANIDE TANKS.	
M-40-02A	DEVELOP CRITERIA FOR UPGRADED TEMPERATURE MONITORING CAPABILITIES IN FERROCYANIDE TANKS.	9/30/1994
	DEVELOP AN AGREED UPON CRITERIA FOR UPGRADED TEMPERATURE MONITORING CAPABILITIES IN FERROCYANIDE TANKS. THE CRITERIA SHALL ADDRESS UPGRADED MONITORING CAPABILITY OF THE FERROCYANIDE TANKS TO MEET SAFETY REQUIREMENTS AND SHALL BE AGREED UPON BY DOE, ECOLOGY, AND EPA. THE CRITERIA WILL ALLOW FOR INSTALLATION OF UPGRADED TEMPERATURE MONITORING IN FERROCYANIDE TANKS AND THE CONTINUED OPERATIONS OF THE TANKS.	
M-40-02B	INSTALL SIX OF TWELVE NEW THERMOCOUPLES.	9/30/1994
	INSTALL SIX NEW THERMOCOUPLE (TC) TREES. WORK INCLUDES PROCUREMENT OF REQUIRED EQUIPMENT, MATERIAL, INSTALLATION, AND PLACEMENT IN OPERATION.	
M-40-03	PERFORM VAPOR CHARACTERIZATION FOR ALL FERROCYANIDE WATCH LIST TANKS.	11/30/1995
	PERFORM QUANTITATIVE VAPOR CHARACTERIZATION TO INCLUDE VOLATILE ORGANICS, INORGANICS, ACID GASES, AND WATER FOR ALL FERROCYANIDE TANKS ON THE WATCH LIST AS OF 9/93. SAMPLING PRIORITY IS DRIVEN BY THE LOGISTICAL CONSIDERATION OF OPERATIONS IN THE TANK FARMS. AS AN EXAMPLE, QUANTITATIVE VAPOR CHARACTERIZATION IS REQUISITE TO ROTARY MODE CORE DRILLING OPERATIONS AND THE ORDER OF VAPOR SAMPLING WILL BE INFLUENCED BY THIS SCHEDULE. OTHERWISE, THE ORDER OF VAPOR SAMPLING IS NOT DRIVEN BY CLASS OR CATEGORY OF WATCH LIST TANKS, BUT RATHER BY THEIR PRESENCE IN A SPECIFIC TANK FARM. GAPS OR EXTENDED PERIODS OF TIME FOR SAMPLING FOR A	

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
	SPECIFIC CATEGORY OF WATCH LIST TANKS (i.e., FERROCYANIDE TANKS) WILL RESULT.	
	VAPOR CHARACTERIZATION RESULTS, ON A TANK-BY-TANK BASIS AS THE TANKS ARE SAMPLED AND ANALYZED, WILL BE MADE AVAILABLE TO EPA AND ECOLOGY IN THE MONTHLY UNIT MANAGERS MEETING.	
M-40-04	COMPLETE REMOVAL OF FLOATING ORGANIC LAYER FROM TANK 241-C-103.	6/30/1995
	COMPLETE REMOVAL OF THE FLOATING ORGANIC LAYER FROM TANK 241-C-103. REMOVAL OF THE ORGANIC LAYER WILL RESOLVE THE SAFETY ISSUE FOR THIS TANK. IT IS ANTICIPATED THAT THE REMOVAL OF THIS FLOATING LAYER WILL ALSO RESOLVE THE NOXIOUS VAPOR ISSUE FOR THE C FARM PROVIDED CHARACTERIZATION OF OTHER C FARM TANKS DO NOT IDENTIFY OTHER POTENTIAL SOURCES OF NOXIOUS VAPORS. THIS ACTIN WILL ALSO RELIEVE RESTRICTIONS ON WORKERS ACCESS TO THE C FARM, IF THERE ARE NO CONSTITUENTS OF THE REMAINING WASTE THAT RESULT IN RESTRICTIONS.	
	THE RETRIEVAL OPTIONS WILL BE EVALUATED IN AN ENGINEERING STUDY OF RETRIEVAL/DISPOSAL OPTIONS DUE IN AUGUST 1994.	
	THE PARTIES AGREE THAT LACK OF RECEIVER TANK IS JUSTIFICATION FOR A CHANGE TO THIS INTERIM MILESTONE.	
M-40-05	COMPLETE SAFETY ALTERNATIVE TEST IN HIGH-HEAT TANK 241-C-106.	9/30/1995
	CONDUCT A SAFETY ALTERNATIVE TEST (STOP ADDITION OF COOLING WATER) IN HIGH-HEAT TANK 241-C-106 FOR ONE YEAR TO REDUCE AND ESTABLISH THE COOLING LIQUID AT A MINIMUM LEVEL. PRIOR TO INITIATING THE TEST, CORE SAMPLES WILL BE OBTAINED AND ANALYZED, THERMOCOUPLES WILL BE REPAIRED AND CONNECTED TO THE TANK MONITOR AND CONTROL SYSTEM (TMACS), AND SAFETY DOCUMENTATION AND PROCEDURES WILL BE PREPARED. THE PROPOSED SAFETY ALTERNATIVE TEST MAY HAVE TO BE ADJUSTED TO ACCOMMODATE UPCOMING ACTIVITIES DURING FISCAL YEAR 1994-1995 IN PREPARATION FOR THE SCHEDULED DECEMBER 1996 RETRIEVAL OF TANK 241-C-106. THE EFFECT OF THE RETRIEVAL ACTIVITIES WILL BE REVIEWED AND ASSESSED IN SEPTEMBER 1994. A RECOMMENDATION WILL BE FORMULATED FOR THE MINIMUM AMOUNT OF WATER ADDITIONS NEEDED. A REPORT WILL BE PREPARED, CLEARED FOR PUBLIC RELEASE, AND TRANSMITTED TO RL FOR SUBSEQUENT ISSUANCE TO THE WASHINGTON DEPARTMENT OF ECOLOGY AND ENVIRONMENTAL PROTECTION AGENCY. COMPLETION OF THIS TEST WILL PROVIDE THE INFORMATION NECESSARY TO DEVELOP A NEW SAFE OPERATING ENVELOPE FOR TANK 241-C-106.	

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Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-40-06	<p>COMPLETE VAPOR SAMPLING CHARACTERIZATION OF TANK 241-C-103 (PHASE 2).</p> <p>REPRESENTATIVE VAPOR SAMPLES WILL BE COLLECTED IN SUMMA CANISTERS, SORBENT TUBES, AND IMPINGERS FOR AN EXTENSIVE, PHASE 2 CHARACTERIZATION OF TANK 241-C-103. THESE WILL BE ANALYZED TO ASSESS THE TANK VAPOR ISSUES. THE RESULTS WILL BE REVIEWED BY THE VAPOR CONFERENCE COMMITTEE FOR PRECISION AND ACCURACY AND A PANEL OF TOXICOLOGICAL EXPERTS FOR ANALYTES OF TOXICOLOGICAL CONCERN.</p>	8/31/1994
M-40-07	<p>COMMENCE OPERATION OF A VAPOR TREATMENT SYSTEM IN TANK 241-C-103.</p> <p>PROVIDE A REPORT DOCUMENTING OPERATIONAL TEST PROCEDURE RESULTS AND COMMENCE PERMITTED OPERATION OF A VAPOR TREATMENT SYSTEM FOR TANK 241-C-103, UNLESS OTHERWISE AGREED TO BY THE PARTIES FOLLOWING SUBMITTAL OF THE ENGINEERING EVALUATION OF ALTERNATIVE (EEA) FOR TREATMENT OF TANK 241-C-103 VAPOR SPACE. THE EEA WILL DOCUMENT THE NEED AND OPTIONS FOR TREATMENT OF POTENTIALLY HAZARDOUS/TOXIC VAPORS BEING DISCHARGED FROM THE TANK 241-C-103 VAPOR SPACE. ALL PERTINENT CHARACTERIZATION DATA WILL BE CONSIDERED INCLUDING: METEOROLOGICAL, AREA, SOURCE, PERSONAL MONITORING, AQUEOUS/ORGANIC LAYER ANALYSIS, VAPOR CHARACTERIZATION, ESTIMATES OF THE VAPOR CHARACTERIZATION AFTER REMOVAL OF THE ORGANIC LAYER, AND THE SCHEDULE FOR THIS REMOVAL. ONCE SELECTED, DESIGN PROCUREMENT, AND PERMITTING WILL BE INITIATED.</p> <p>OPERATION OF THIS VAPOR TREATMENT SYSTEM IS ANTICIPATED TO PROVIDE RELIEF FROM WORKER RESTRICTIONS AT TANK 241-C-103 IN REGARD TO NOXIOUS VAPOR EMISSIONS (PROVIDED CHARACTERIZATION OF OTHER C FARM TANKS DOES NOT IDENTIFY OTHER POTENTIAL SOURCES OF NOXIOUS VAPORS).</p>	6/30/1995
M-40-08	<p>PERFORM VAPOR CHARACTERIZATION FOR ALL ORGANIC WATCH LIST TANKS.</p> <p>PERFORM QUANTITATIVE VAPOR CHARACTERIZATION TO INCLUDE VOLATILE ORGANICS, INORGANICS, ACID GASES, AND WATER FOR ALL ORGANIC WATCH LIST TANKS. SAMPLING PRIORITY IS DRIVEN BY THE LOGISTICAL CONSIDERATION OF OPERATIONS IN TANK FARMS. AS AN EXAMPLE, QUANTITATIVE VAPOR CHARACTERIZATION IS REQUISITE TO ROTARY MODE CORE DRILLING OPERATIONS AND THE ORDER OF VAPOR SAMPLING WILL BE INFLUENCED BY THIS SCHEDULE. OTHERWISE, THE ORDER OF VAPOR SAMPLING IS NOT DRIVEN BY CLASS OR CATEGORY OF WATCH LIST TANKS, BUT RATHER BY THEIR PRESENCE IN A SPECIFIC TANK FARM. GAPS OR EXTENDED</p>	11/30/1995

Table D. Major and Interim Milestones

Number	Milestone	Due Date
	<p>PERIODS OF TIME FOR SAMPLING FOR A SPECIFIC CATEGORY OF WATCH LIST TANKS (i.e., ORGANIC TANKS) WILL RESULT.</p> <p>VAPOR CHARACTERIZATION RESULTS, ON A TANK-BY-TANK BASIS AS THE TANKS ARE SAMPLED AND ANALYZED, WILL BE MADE AVAILABLE TO EPA AND ECOLOGY IN THE MONTHLY UNIT MANAGERS MEETING.</p>	
M-40-09	<p>CLOSE ALL UNREVIEWED SAFETY QUESTIONS (USQ) FOR DOUBLE-SHELL AND SINGLE-SHELL TANKS.</p> <p>FOUR UNREVIEWED SAFETY QUESTIONS (USQ) HAVE BEEN IDENTIFIED ON HANFORD SINGLE-SHELL AND DOUBLE-SHELL WASTE TANKS AS OF SEPTEMBER 30, 1993: HIGH FLAMMABLE GAS CONCENTRATIONS, POTENTIALLY EXPLOSIVE MIXTURES OF FERROCYANIDE, POTENTIAL FOR NUCLEAR CRITICALITY, AND EXISTENCE OF A SEPARABLE ORGANIC PHASE (FLOATING LAYER). FOR EACH USQ, DATA WILL BE COLLECTED AND SAFETY DOCUMENTATION, INCLUDING NEW OPERATING SAFETY ENVELOPES AND APPROPRIATE WORK CONTROLS, WILL BE SUBMITTED FOR APPROVAL. THIS WILL BE FOLLOWED BY A USQ SCREENING AND EVALUATION SUBMITTED FOR APPROVAL, AND FINALLY BY A RECOMMENDATION FOR USQ CLOSURE. THE RECOMMENDATION FOR CLOSURE OF A USQ WILL BE TRANSMITTED TO RL WHEN A TANK, GROUP OF TANKS, OR ALL TANKS HAVE BEEN SUFFICIENTLY REVIEWED TO REMOVE THE USQ RESTRICTIONS. THE ANTICIPATED ORDER OF USQ CLOSURE IS AS FOLLOWS: FIRST 6 FERROCYANIDE TANKS, 241-C-103 ORGANIC LAYER, REMAINING FERROCYANIDE TANKS, CRITICALITY, 241-SY FARM FLAMMABLE GAS TANKS, 241-AW-101 FLAMMABLE GAS TANKS, 241-AN FARM FLAMMABLE GAS TANKS, AND 18 SINGLE-SHELL FLAMMABLE GAS TANKS.</p> <p>THE PARTIES RECOGNIZE THE EXISTENCE OF A USQ DOES NOT PROHIBIT THE CONTINUATION OR INITIATION OF WORK IN THE TANK FARMS.</p>	9/30/1998
M-40-10	<p>COMPLETE VAPOR SPACE MONITORING FOR ALL FLAMMABLE GAS GENERATING TANKS.</p> <p>DESIGN, PROCURE, AND FABRICATE STANDARD HYDROGEN MONITORING SYSTEMS (SHMS) FOR ALL UNREVIEWED SAFETY QUESTION (USQ) FLAMMABLE GAS GENERATING TANKS. PREPARE ALL REQUIRED SAFETY AND ENVIRONMENTAL DOCUMENTATION FOR TANK INTRUSIVE WORK ON A TANK BY TANK, OR GROUP OF TANKS, BASIS. INSTALL THE SHMSs AND OBTAIN VAPOR SPACE GRAB SAMPLES. ANALYZE SAMPLES USING A HIGH SENSITIVITY MASS SPECTROMETER TO DETERMINE THE CONCENTRATIONS OF FLAMMABLE GASES (HYDROGEN, NITROUS OXIDE, AMMONIA) FOR ALL TANKS, AND THE BACKGROUND GAS COMPOSITIONS FOR THE DOUBLE-SHELL TANKS THAT ENTRAP AND PERIODICALLY RELEASE GAS. THE VAPOR SPACE OF EACH TANK WILL BE OBSERVED OVER A SUFFICIENT PERIOD OF TIME TO MAKE DECISIONS</p>	1/31/1997

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Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
	REGARDING RESOLUTION OF THE SAFETY ISSUE. A REPORT, WITH THE ANALYTICAL DATA FOR EACH TANK, WILL BE PREPARED, CLEARED FOR PUBLIC RELEASE, AND TRANSMITTED TO RL FOR SUBSEQUENT ISSUANCE TO THE WASHINGTON DEPARTMENT OF ECOLOGY AND ENVIRONMENTAL PROTECTION AGENCY.	
	MONITORING WILL CONTINUE AFTER THE INITIAL REPORT.	
M-40-11	CLOSE THE UNREVIEWED SAFETY QUESTION FOR THE CRITICALITY ISSUE.	6/30/1994
	CLOSURE OF THE USQ WILL REDUCE THE SAFETY RESTRICTIONS ON WASTE TRANSFERENCE TO AND FROM THE TANK FARMS. RESOLUTION OF THE CRITICALITY ISSUE WILL CONTINUE UNDER MILESTONE M-40-12.	
M-40-12	RESOLVE NUCLEAR CRITICALITY SAFETY ISSUE.	9/30/1999
	RESOLVE THE POTENTIAL FOR NUCLEAR CRITICALITY SAFETY ISSUE BY PROVIDING SUFFICIENT MONITORING, ANALYSIS, AND REVISION OF APPROPRIATE SAFETY DOCUMENTATION. THESE ACTIVITIES MUST ADDRESS THE VARIOUS STAGES OF WASTE TRANSFERENCE AND THE POSSIBILITY FOR CHANGES IN THE POTENTIAL FOR NUCLEAR CRITICALITY INCIDENTS DURING WASTE TRANSFERS.	
M-40-13	DOCUMENT 100% DESIGN COMPLETION OF PERMANENT MITIGATION PUMP FOR TANK 241-SY-101.	7/31/1994
	DESIGN A PERMANENT MIXER PUMP FOR TANK 241-SY-101. THE PERMANENT PUMP WILL HAVE A DESIGN LIFE EXCEEDING FIVE YEARS AND WILL REPLACE THE TEST PUMP THAT IS CURRENTLY INSTALLED IN THE TANK.	
M-40-14	CLOSE FERROCYNANIDE UNREVIEWED SAFETY QUESTION.	3/31/1994
	DEVELOP SAFETY CRITERIA TO DEFINE CONDITIONS FOR ON SITE SAFE STORAGE OF FERROCYNANIDE WASTE THAT SATISFY DOE REQUIREMENTS FOR CLOSURE OF THE FERROCYNANIDE USQ. THE SCOPE OF WORK INCLUDES WORKING WITH DOE-RL AND -HQ PERSONNEL TO INCORPORATE ALL REVIEWER COMMENTS INTO THE SAFETY DOCUMENTATION FOR USQ CLOSURE OF ALL FERROCYNANIDE TANKS, RESUBMIT TO DOE FOR APPROVAL, AND SUPPORT APPROVAL BY DOE OF FERROCYNANIDE USQ CLOSURE DOCUMENTATION.	
M-40-15	INSTALL GAS MONITORING EQUIPMENT IN THE REMAINING FIVE POTENTIALLY FLAMMABLE DSTs.	9/30/1994
	INSTALL THE EXISTING STANDARD HYDROGEN MONITORING SYSTEMS (SHMS) ON TANK 241-SY-103; FABRICATE AND INSTALL GAS MONITORS ON TANKS 241-AW-101, AND 241-AN-	

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Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
	103, -104 AND -105: PREPARE ALL ASSOCIATED FIELD WORK PACKAGES; READINESS REVIEWS; AND SITE PREPARATION.	
M-40-16	COMPLETE SAMPLING AND SAFETY EVALUATION OF LIQUID ORGANIC IN TANK 241-C-103.	3/31/1994
	COMPLETE INTERIM SAFETY BASIS LEVEL 1 TOPICAL REPORT IN SUPPORT OF TANK 241-C-103 USQ CLOSURE. THIS REPORT WILL INCORPORATE ANALYTICAL RESULTS FROM TANK 241-C-103 DIP SAMPLE ANALYTICAL REPORT. THE REPORT WILL ASSESS POTENTIAL ACCIDENT EVENTS RELATED TO BURNING OF THE ORGANIC LAYER AND/OR HEAD SPACE GAS, AND IDENTIFY CONTROLS FOR CONTINUED SAFE INTERIM STORAGE INCLUDING ANTICIPATED NEAR-TERM OPERATIONS.	
M-40-17	CLOSE TANK 241-C-103 UNREVIEWED SAFETY QUESTION.	5/31/1994
	SUPPORT APPROVAL BY DOE OF TANK 241-C-103 CLOSURE DOCUMENTATION BY PROVIDING INPUT AS NECESSARY.	
M-41-00	COMPLETE SINGLE-SHELL TANK INTERIM STABILIZATION.	9/30/2000

COMPLETE INTERIM STABILIZATION ACTIVITIES FOR ALL SINGLE-SHELL TANKS EXCEPT 241-C-106 (TO BE RETRIEVED IN ACCORDANCE WITH MILESTONE M-45-03). COMPLETE INTRUSION PREVENTION FOR ALL SINGLE-SHELL TANKS EXCEPT 241-C-106.

THIS IS DEPENDENT UPON THE FOLLOWING ASSUMPTIONS:

(1) SAFETY STUDIES WILL BE COMPLETED WITH THE OBJECTIVE OF ALLOWING PUMPING IN ACCORDANCE WITH INTERIM MILESTONES.

(2) WORK COMMENCES IN THE TANK FARMS ON OCTOBER 1, 1993, FOR INTERIM STABILIZATION PREPARATIONS, AS REQUIRED BY THE MILESTONE SCHEDULES. DURING THE STAND DOWN IN TANK FARMS, SCHEDULES FOR THE FOLLOWING INTERIM MILESTONES MAY BE AFFECTED: M-41-01, M-41-02, M-41-10, AND M-41-16. EVERY EFFORT WILL BE MADE TO RECOVER THE ORIGINAL SCHEDULE AS SPECIFIED BELOW.

INTERIM MILESTONES FOR START OF PUMPING AND TARGET MILESTONES FOR COMPLETION FOR EACH GROUP OF TANKS WILL BE REVIEWED AND AFFIRMED ANNUALLY WITH ECOLOGY AND EPA. UPON START OF THE PUMPING, EFFORTS TO CONTINUE PUMPING WILL BE CONTINUOUSLY SUPPORTED SO THAT PUMPING IS CONDUCTED AS EXPEDITIOUSLY AS PRACTICAL. IF PUMPING IS INTERRUPTED TO A DEGREE THAT JEOPARDIZES THE TARGET MILESTONE, THE UNIT MANAGERS SHALL MEET IN THE EFFORT TO AGREE ON A RECOVERY PLAN. IF SUCH AN AGREEMENT CANNOT BE MADE AT THE UNIT MANAGER LEVEL, A FORMAL RECOVERY PLAN WILL BE PREPARED AND SUBMITTED TO ECOLOGY

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Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
	FOR APPROVAL THAT SUPPORTS THE MAJOR MILESTONE DATE OF SEPTEMBER 2000, IF TECHNICALLY ACHIEVABLE.	
M-41-01-T01	START TO INTERIM STABILIZE AN ADDITIONAL 3 SINGLE-SHELL TANKS.	8/31/1994
M-41-01-T02	COMPLETE INTERIM STABILIZATION OF 5 SINGLE-SHELL TANKS.	11/30/1994
M-41-01-T03	START TO INTERIM STABILIZE AN ADDITIONAL 2 SINGLE-SHELL TANKS.	5/31/1994
M-41-02	EMERGENCY LEAK RESPONSE: PREPARE AN IMPROVED SINGLE-SHELL TANK EMERGENCY PUMPING CAPABILITY AS DEFINED BELOW.	3/31/1995
M-41-02-T01	COMPLETE AND SUBMIT TO ECOLOGY AND EPA A SAFETY ANALYSIS REPORT TO ALLOW ALTERNATIVE METHODS FOR TRANSFER OF RADIOACTIVE WASTE WITHIN SINGLE-SHELL TANK FARMS.	12/31/1993 (Completed)
M-41-02-T02	COMPLETE DESIGN AND PROCUREMENT OF ALTERNATE TRANSFER METHODS, AND MOUNT APPROPRIATE EQUIPMENT IN THE EMERGENCY PUMPING TRAILER.	9/30/1994
M-41-02-T03	ISSUE AND SUBMIT TO ECOLOGY AND EPA THE DETAILED PROCEDURES FOR EMERGENCY PUMPING (OR OTHER ACTION IF NOT SAFE TO PUMP) FOR EACH NON-INTERIM STABILIZED TANK.	3/31/1995
M-41-02-T04	RESTORE THE 244-U DOUBLE-CONTAINED RECEIVER TANK (DCRT) TO COMPLIANT OPERATING CONDITION. THIS WILL ALLOW THE USE OF THIS DCRT FOR INTERIM STABILIZATION.	3/31/1995
M-41-03A	ISSUE REQUEST FOR PROPOSAL FOR A MOBILE HIGH-LEVEL LIQUID WASTE TRANSPORT CASK. THIS CASK MUST ALREADY BE DESIGNED TO MEET APPLICABLE DOT AND NRC LICENSING REQUIREMENTS.	2/28/1994 (Completed)
M-41-03B	DELIVERY OF THE MOBILE HIGH-LEVEL LIQUID WASTE TRANSPORT CASK. THIS MILESTONE IS PREDICATED ON THE RESPONSE RECEIVED TO THE PROCUREMENT REQUEST. UPON AWARD OF CONTRACT, THE CONTRACT DELIVERY DATE WILL BE ESTABLISHED AS THIS MILESTONE DATE.	TBD
M-41-04	THE USDOE SHALL PROVIDE TO EPA AND ECOLOGY A DETAILED SCHEDULE SHOWING POSITIVE AND NEGATIVE IMPACTS OF THE 1993 TANK FARMS STAND DOWN ON THE INTERIM STABILIZATION PROGRAM.	11/30/1993 (Completed)
M-41-05	THE USDOE SHALL COMPLETE THE PORTIONS OF THE NUCLEAR OPERATOR SYSTEMS CLASS AND ON-THE-JOB TRAINING THAT RELATE TO THE OPERATOR ROUTINES AND LIQUID LEVEL MONITORING. DOCUMENTATION OF COMPLETION OF OPERATOR	12/31/1993 (Completed)

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
	TRAINING SHALL BE PROVIDED BY SUBMITTAL OF A LETTER FROM USDOE TO EPA AND ECOLOGY.	
M-41-06	THE USDOE SHALL PROVIDE TO EPA AND ECOLOGY THE DRAFT CURRICULA FOR THE UPGRADED MAINTENANCE TRAINING PROGRAM AND AN IMPLEMENTATION SCHEDULE FOR THAT TRAINING.	6/30/1994
M-41-07	COMPLETE SAFETY STUDIES AND ANALYSIS ON INTERIM STABILIZATION OF REMAINING WATCH LIST TANKS AND PROVIDE THE REPORT(S) TO ECOLOGY AND EPA. THESE STUDIES TO INCLUDE: A) FERROCYANIDE TANKS; B) HYDROGEN/FLAMMABLE GAS TANKS; AND C) ORGANIC TANKS. IF THESE STUDIES RECOMMEND THAT A WATCH LIST TANK NOT BE PUMPED, DOE SHALL SUBMIT TO ECOLOGY AND EPA A JUSTIFICATION REPORT WHICH CONTAINS THE RATIONALE FOR NOT PUMPING. THE RATIONALE WILL BE PRESENTED ON A TANK-BY-TANK BASIS.	12/31/1994
M-41-08	START INTERIM STABILIZATION OF 1 NON-WATCH LIST TANK IN 241-U TANK FARM.	7/31/1995
M-41-08-T01	COMPLETE INTERIM STABILIZATION OF 1 NON-WATCH LIST TANK IN 241-U TANK FARM.	3/31/1996
M-41-09	START INTERIM STABILIZATION OF 7 NON-WATCH LIST TANKS IN 241-S TANK FARM.	1/31/1996
M-41-09-T01	COMPLETE INTERIM STABILIZATION OF 7 NON-WATCH LIST TANKS IN 241-S TANK FARM.	4/30/1997
M-41-10	START INTERIM STABILIZATION OF 2 FLAMMABLE GAS WATCH LIST TANKS IN 241-A/AX TANK FARMS.	4/30/1996
M-41-10-T01	COMPLETE INTERIM STABILIZATION OF 2 FLAMMABLE GAS WATCH LIST TANKS IN 241-A/AX TANK FARMS.	12/31/1998
M-41-11	START INTERIM STABILIZATION OF 4 FLAMMABLE GAS WATCH LIST TANKS IN 241-U TANK FARMS.	4/30/1996
M-41-11-T01	COMPLETE INTERIM STABILIZATION OF 4 FLAMMABLE GAS WATCH LIST TANKS IN 241-U TANK FARMS.	5/31/1997
M-41-12	START INTERIM STABILIZATION OF 4 FERROCYANIDE WATCH LIST TANKS IN 241-BX/BY TANK FARMS.	4/30/1997
M-41-12-T01	COMPLETE INTERIM STABILIZATION OF 4 FERROCYANIDE WATCH LIST TANKS IN 241-BX/BY TANK FARMS.	9/30/1998
M-41-13	START INTERIM STABILIZATION OF 3 ORGANIC WATCH LIST TANKS IN 241-U TANK FARM.	7/31/1995
M-41-13-T01	COMPLETE INTERIM STABILIZATION OF 3 ORGANIC WATCH LIST TANKS IN 241-U TANK FARM.	12/31/1996

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-41-14	START INTERIM STABILIZATION OF 7 FLAMMABLE GAS WATCH LIST TANKS IN 241-S/SX TANK FARMS.	6/30/1997
M-41-14-T01	COMPLETE INTERIM STABILIZATION OF 7 FLAMMABLE GAS WATCH LIST TANKS IN 241-S/SX TANK FARMS.	11/30/1999
M-41-15	START INTERIM STABILIZATION OF 2 ORGANIC WATCH LIST TANKS IN 241-S/SX TANK FARMS.	6/30/1997
M-41-15-T01	COMPLETE INTERIM STABILIZATION OF 2 ORGANIC WATCH LIST TANKS IN 241-S/SX TANK FARMS.	3/31/1999
M-41-16	START INTERIM STABILIZATION OF 2 NON-WATCH LIST TANKS IN 241-T TANK FARM.	3/30/1998
M-41-16-T01	COMPLETE INTERIM STABILIZATION OF 2 NON-WATCH LIST TANKS IN 241-T TANK FARM.	8/31/1998
M-41-17	START INTERIM STABILIZATION OF 1 FERROCYANIDE WATCH LIST TANK IN 241-T TANK FARM.	4/30/1998
M-41-17-T01	COMPLETE INTERIM STABILIZATION OF 1 FERROCYANIDE WATCH LIST TANK IN 241-T TANK FARM.	5/31/1998
M-41-18	START INTERIM STABILIZATION OF 1 FLAMMABLE GAS WATCH LIST TANK IN 241-T TANK FARM.	4/30/1998
M-41-18-T01	COMPLETE INTERIM STABILIZATION OF 1 FLAMMABLE GAS WATCH LIST TANK IN 241-T TANK FARM.	7/31/1998
M-41-19	START INTERIM STABILIZATION OF 1 ORGANIC WATCH LIST TANK IN 241-C-TANK FARM.	9/30/1998
M-41-19-T01	COMPLETE INTERIM STABILIZATION OF 1 ORGANIC WATCH LIST TANK IN 241-C-TANK FARM.	3/31/1999
M-42-00	PROVIDE ADDITIONAL DOUBLE-SHELL TANK CAPACITY.	12/31/1998
M-42-01	INITIATE "HOT" OPERATIONS OF THE MWTF 200W AREA TANKS.	2/28/1998
M-42-01-T01	INITIATE DETAILED DESIGN OF THE MWTF 200W AREA TANKS.	3/31/1994
M-42-01-T02	INITIATE CONSTRUCTION OF THE MWTF 200W AREA TANKS.	9/30/1994
M-42-02	COMPLETE CONSTRUCTION OF THE MWTF 200E AREA TANKS.	9/30/1998
M-42-02-T01	INITIATE CONSTRUCTION OF THE MWTF 200E AREA TANKS.	2/28/1995
M-42-02-T02	COMPLETE THE DETAILED DESIGN OF THE MWTF 200E AREA TANKS.	1/31/1996
M-43-00	COMPLETE TANK FARM UPGRADES.	6/30/2005

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Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-43-01	COMPLETE PROJECT W-030 TANK FARM VENTILATION UPGRADES	12/31/1996
M-43-01-T01	COMPLETE DEFINITIVE DESIGN FOR W-030	7/31/1994
M-43-01A	START CONSTRUCTION FOR W-030	10/31/1994
M-43-01B	COMPLETE CONSTRUCTION FOR W-030	10/31/1996
M-43-01C	BEGIN OPERATION FOR W-030	12/31/1996
M-43-02	COMPLETE PROJECT W-314B DOUBLE SHELL TANK VENTILATION UPGRADE.	6/30/2002
M-43-02-T01	PROVIDE THE WASHINGTON STATE DEPARTMENT OF ECOLOGY AND DEPARTMENT OF HEALTH THE PROJECT ENGINEERING STUDY, AND SCOPE STATEMENT (FOR PROJECT W-314B DOUBLE SHELL TANK VENTILATION UPGRADE).	2/28/1994 (Completed)
M-43-02-T02	PROVIDE THE WASHINGTON STATE DEPARTMENT OF ECOLOGY AND DEPARTMENT OF HEALTH THE PROJECT FUNCTIONS AND REQUIREMENTS (FOR PROJECT W-314B DOUBLE SHELL TANK VENTILATION UPGRADE).	4/30/1994
M-43-02-T03	PROVIDE THE WASHINGTON STATE DEPARTMENT OF ECOLOGY AND DEPARTMENT OF HEALTH THE PROJECT CONCEPTUAL DESIGN STATEMENT OF WORK AND CONCEPTUAL DESIGN CRITERIA (FOR PROJECT W-314B DOUBLE SHELL TANK VENTILATION UPGRADE).	6/30/1994
M-43-02-T05	PROVIDE THE WASHINGTON STATE DEPARTMENT OF ECOLOGY AND DEPARTMENT OF HEALTH THE PROJECT DESIGN CRITERIA (FOR PROJECT W-314B DOUBLE SHELL TANK VENTILATION UPGRADE).	9/30/1995
M-43-02-T06	RECEIVE DOE-HQ PROJECT VALIDATION TO REQUEST CONGRESSIONAL FUNDING (FOR PROJECT W-314B DOUBLE SHELL TANK VENTILATION UPGRADE).	6/30/1995
M-43-02-T07	START DEFINITIVE DESIGN FOR W-314B.	1/31/1997
M-43-02-T08	COMPLETE DEFINITIVE DESIGN FOR W-314B.	1/31/1999
M-43-02-T09	START CONSTRUCTION FOR W-314B.	3/31/1999
M-43-02A	PROVIDE THE WASHINGTON STATE DEPARTMENT OF ECOLOGY AND DEPARTMENT OF HEALTH THE PROJECT CONCEPTUAL DESIGN REPORT (OF PROJECT W-314B DOUBLE-SHELL TANK UPGRADE).	5/31/1995
M-43-02B	COMPLETE CONSTRUCTION OF W-314B (DOUBLE SHELL TANK VENTILATION UPGRADE).	12/31/2001
M-43-02C	START OPERATION OF W-314B (DOUBLE SHELL TANK VENTILATION UPGRADE).	6/30/2002



Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-43-03	PROVIDE THE WASHINGTON STATE DEPARTMENT OF ECOLOGY AND DEPARTMENT OF HEALTH THE RESULTS OF THE SINGLE SHELL TANK VENTILATION UPGRADES NEEDS ANALYSIS.	3/31/1997
M-43-04	COMPLETE PROJECT W-314A TANK FARM INTEGRATED INSTRUMENTATION SYSTEM UPGRADES.	6/30/2002
M-43-04-T01	PROVIDE THE WASHINGTON STATE DEPARTMENT OF ECOLOGY AND DEPARTMENT OF HEALTH THE PROJECT ENGINEERING STUDY, AND SCOPE STATEMENT (FOR PROJECT W-314A TANK FARM INTEGRATED INSTRUMENTATION SYSTEM UPGRADE).	3/31/1994
M-43-04-T02	PROVIDE THE WASHINGTON STATE DEPARTMENT OF ECOLOGY AND DEPARTMENT OF HEALTH THE PROJECT FUNCTIONS AND REQUIREMENTS (FOR PROJECT W-314A TANK FARM INTEGRATED INSTRUMENTATION SYSTEM UPGRADE).	5/31/1994
M-43-04-T03	PROVIDE THE WASHINGTON STATE DEPARTMENT OF ECOLOGY AND DEPARTMENT OF HEALTH THE PROJECT CONCEPTUAL DESIGN STATEMENT OF WORK AND CONCEPTUAL DESIGN CRITERIA (FOR PROJECT W-314A TANK FARM INTEGRATED INSTRUMENTATION SYSTEM UPGRADE).	6/30/1994
M-43-04-T04	PROVIDE WASHINGTON STATE DEPARTMENT OF ECOLOGY AND DEPARTMENT OF HEALTH THE PROJECT DESIGN CRITERIA (FOR 314A TANK FARM INTEGRATED INSTRUMENTATION SYSTEM UPGRADE).	9/30/1995
M-43-04-T05	RECEIVE DOE-HQ PROJECT VALIDATION TO REQUEST CONGRESSIONAL FUNDING (FOR W-314A TANK FARM INTEGRATED INSTRUMENTATION SYSTEM UPGRADE).	6/30/1995
M-43-04-T06	START DEFINITIVE DESIGN FOR W-314A.	1/31/1996
M-43-04-T07	COMPLETE DEFINITIVE DESIGN FOR W-314A.	11/30/1998
M-43-04-T08	START CONSTRUCTION OF W-314A.	12/31/1998
M-43-04A	PROVIDE THE WASHINGTON STATE DEPARTMENT OF ECOLOGY AND DEPARTMENT OF HEALTH THE PROJECT CONCEPTUAL DESIGN REPORT (FOR PROJECT W-314A TANK FARM INTEGRATED INSTRUMENTATION SYSTEM UPGRADE).	5/31/1995
M-43-04B	PROVIDE THE WASHINGTON STATE DEPARTMENT OF ECOLOGY AND DEPARTMENT OF HEALTH AN INTEGRATED LEVEL 3 SCHEDULE SHOWING ALL PHASES OF PROJECT CONSTRUCTION (FOR PROJECT W-314A TANK FARM INTEGRATED INSTRUMENTATION SYSTEM UPGRADE).	12/31/1998
M-43-04C	COMPLETE CONSTRUCTION OF W-314A.	12/31/2001
M-43-04D	START OPERATION OF W-314A.	6/30/2002

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-43-05	PROJECT W-314C TRANSFER SYSTEM UPGRADES	6/30/2004
M-43-05-T01	PROVIDE THE WASHINGTON STATE DEPARTMENT OF ECOLOGY THE PROJECT ENGINEERING STUDY , AND SCOPE STATEMENT (PROJECT W-314C TRANSFER SYSTEM UPGRADES).	2/28/1995
M-43-05-T02	PROVIDE THE WASHINGTON STATE DEPARTMENT OF ECOLOGY THE PROJECT FUNCTIONS AND REQUIREMENTS (PROJECT W-314C TRANSFER SYSTEM UPGRADES).	4/30/1995
M-43-05-T03	PROVIDE THE WASHINGTON STATE DEPARTMENT OF ECOLOGY THE PROJECT CONCEPTUAL DESIGN STATEMENT OF WORK AND CONCEPTUAL DESIGN CRITERIA (PROJECT W-314C TRANSFER SYSTEM UPGRADES).	6/30/1995
M-43-05-T05	PROVIDE THE WASHINGTON STATE DEPARTMENT OF ECOLOGY THE PROJECT DESIGN CRITERIA (PROJECT W-314C TRANSFER SYSTEM UPGRADES).	9/30/1996
M-43-05-T06	RECEIVE DOE-HQ PROJECT VALIDATION TO REQUEST CONGRESSIONAL FUNDING (FOR PROJECT W-314C TRANSFER SYSTEM UPGRADES).	6/30/1996
M-43-05-T07	START DEFINITIVE DESIGN FOR W-314C.	1/31/1998
M-43-05-T08	COMPLETE DEFINITIVE DESIGN FOR W-314C.	11/30/2000
M-43-05-T09	START CONSTRUCTION OF W-314C.	3/31/2000
M-43-05A	PROVIDE THE WASHINGTON STATE DEPARTMENT OF ECOLOGY THE PROJECT CONCEPTUAL DESIGN REPORT (PROJECT W-314C TRANSFER SYSTEM UPGRADES).	5/31/1996
M-43-05B	COMPLETE CONSTRUCTION OF W-314C.	12/31/2003
M-43-05C	START OPERATION OF W-314C.	6/30/2004
M-43-06	COMPLETE PROJECT W-314D TANK FARM ELECTRICAL UPGRADE.	6/30/2005
M-43-06-T01	PROVIDE THE WASHINGTON STATE DEPARTMENT OF ECOLOGY THE PROJECT ENGINEERING STUDY, AND SCOPE STATEMENT (FOR PROJECT W-314D TANK FARM ELECTRICAL UPGRADE).	2/28/1996
M-43-06-T02	PROVIDE THE WASHINGTON STATE DEPARTMENT OF ECOLOGY THE PROJECT FUNCTIONS AND REQUIREMENTS (FOR PROJECT W-314D TANK FARM ELECTRICAL UPGRADE).	4/30/1996
M-43-06-T03	PROVIDE THE WASHINGTON STATE DEPARTMENT OF ECOLOGY THE PROJECT CONCEPTUAL DESIGN STATEMENT OF WORK AND CONCEPTUAL DESIGN CRITERIA (FOR PROJECT W-314D TANK FARM ELECTRICAL UPGRADE).	6/30/1996

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-43-06-T05	PROVIDE THE WASHINGTON STATE DEPARTMENT OF ECOLOGY THE PROJECT DESIGN CRITERIA (FOR PROJECT W-314D TANK FARM ELECTRICAL UPGRADE).	9/30/1997
M-43-06-T06	RECEIVE DOE-HQ PROJECT VALIDATION TO REQUEST CONGRESSIONAL FUNDING (FOR PROJECT W-314D TANK FARM ELECTRICAL UPGRADE).	6/30/1997
M-43-06-T07	START DEFINITIVE DESIGN FOR W-314D.	1/31/1999
M-43-06-T08	COMPLETE DEFINITIVE DESIGN FOR W-314D.	10/31/2001
M-43-06-T09	START CONSTRUCTION OF W-314D.	3/31/2001
M-43-06A	PROVIDE THE WASHINGTON STATE DEPARTMENT OF ECOLOGY THE PROJECT CONCEPTUAL DESIGN REPORT (FOR PROJECT W-314D TANK FARM ELECTRICAL UPGRADE).	5/31/1997
M-43-06B	COMPLETE CONSTRUCTION OF W-314D.	12/31/2004
M-43-06C	START OPERATION OF W-314D.	6/30/2005
M-43-07	COMPLETE PROJECT W-058 REPLACEMENT OF CROSS-SITE TRANSFER SYSTEM.	2/28/1998
M-43-07-T01	COMPLETE DEFINITIVE DESIGN FOR W-058.	8/31/1995
M-43-07A	START CONSTRUCTION FOR W-058.	11/30/1995
M-43-07B	COMPLETE CONSTRUCTION FOR W-058.	8/31/1997
M-43-07C	CROSS SITE TRANSFER SYSTEM OPERATIONAL.	2/28/1998
M-44-00	ISSUE TANK CHARACTERIZATION REPORTS (TCRs) BASED ON PROCESS KNOWLEDGE, PRIOR CHARACTERIZATION DATA, AND VALIDATED EMPIRICAL DATA ACQUIRED AFTER MAY 1989 FOR 177 HANFORD HIGH LEVEL WASTE TANKS. PROVIDE OFFSITE ACCESS TO ELECTRONIC DATABASE(S) CONTAINING TANK CHARACTERIZATION INFORMATION THROUGH THE TANK CHARACTERIZATION DATABASE (TCD) AND HANFORD ENVIRONMENTAL INFORMATION SYSTEM (HEIS) THROUGH THE TANK WASTE INFORMATION NETWORK SYSTEM (TWINS) OR APPROVED ANALOGUES FOR 177 HLW TANKS.	9/30/1999

ALL ISSUED TCRs WILL BE UPDATED QUARTERLY AS NEEDED DUE TO ADDITION AND/OR REMOVAL OF TANK WASTES AND AS NEW INFORMATION IS OBTAINED.

VALIDATED DATA PACKAGES ARE TO BE PLACED IN THE ADMINISTRATIVE RECORD.

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-44-01A	SUBMIT A DRAFT COPY OF THE TWRS TANK WASTE ANALYSIS PLAN'S (TWAP) AND TANK CHARACTERIZATION PLAN'S (TCPs) REVISIONS, UPDATES, AND ADDITIONS ANNUALLY TO ECOLOGY AND EPA.	5/31/1994
M-44-01B	SUBMIT A DRAFT COPY OF THE TWRS TANK WASTE ANALYSIS PLAN'S (TWAP) AND TANK CHARACTERIZATION PLAN'S (TCPs) REVISIONS, UPDATES, AND ADDITIONS ANNUALLY TO ECOLOGY AND EPA.	5/31/1995
M-44-01C	SUBMIT A DRAFT COPY OF THE TWRS TANK WASTE ANALYSIS PLAN'S (TWAP) AND TANK CHARACTERIZATION PLAN'S (TCPs) REVISIONS, UPDATES, AND ADDITIONS ANNUALLY TO ECOLOGY AND EPA.	5/31/1996
M-44-01D	SUBMIT A DRAFT COPY OF THE TWRS TANK WASTE ANALYSIS PLAN'S (TWAP) AND TANK CHARACTERIZATION PLAN'S (TCPs) REVISIONS, UPDATES, AND ADDITIONS ANNUALLY TO ECOLOGY AND EPA.	5/31/1997
M-44-01E	SUBMIT A DRAFT COPY OF THE TWRS TANK WASTE ANALYSIS PLAN'S (TWAP) AND TANK CHARACTERIZATION PLAN'S (TCPs) REVISIONS, UPDATES, AND ADDITIONS ANNUALLY TO ECOLOGY AND EPA.	5/31/1998
M-44-01F	SUBMIT A DRAFT COPY OF THE TWRS TANK WASTE ANALYSIS PLAN'S (TWAP) AND TANK CHARACTERIZATION PLAN'S (TCPs) REVISIONS, UPDATES, AND ADDITIONS ANNUALLY TO ECOLOGY AND EPA.	5/31/1999
M-44-02A	SUBMIT TWAP ANNUALLY TO ECOLOGY AND EPA FOR APPROVAL. THE TWAP WILL COVER SAFETY, RETRIEVAL, PRETREATMENT, AND OTHER PROCESSING NEEDS. THE TWAP WILL IDENTIFY SAMPLING AND ANALYSIS ACTIVITIES PROJECTED FOR THE FOLLOWING FISCAL YEAR. THE TWAP WILL DESCRIBE THE TCPs TO BE ISSUED FOR THE YEAR. THE TCPs WILL COVER SAMPLING AND ANALYSIS ACTIVITIES FOR EACH DST AND SST TO BE CHARACTERIZED IN THE FOLLOWING FISCAL YEAR. THE TWAP WILL ALSO IDENTIFY THE FOLLOWING YEAR'S TCRs TO BE SUBMITTED AND ON WHAT TYPE OF DATA THEY WILL BE BASED. THE TWAP WILL SPECIFY THE CONTENTS OF THESE TCRs. THE TWAP AND TCPs WILL BE DEVELOPED VIA A DQO PROCESS INVOLVING EPA, ECOLOGY, AND USDOE PRIOR TO IMPLEMENTATION. IF THE THREE PARTIES DO NOT AGREE ON ANY INDIVIDUAL TCP THEN ECOLOGY WILL ISSUE A FINAL DECISION BY SEPTEMBER 30 OF THAT YEAR FOR THE SCOPE OF THE PLAN. USDOE WILL IMPLEMENT THE FINAL DECISION. IF USDOE DISPUTES THE FINAL DECISION THE ECOLOGY FINAL DECISION WILL BE IMPLEMENTED DURING THE DISPUTE RESOLUTION PROCESS.	8/31/1994

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-44-02B	SUBMIT TWAP ANNUALLY TO ECOLOGY AND EPA FOR APPROVAL. THE TWAP WILL COVER SAFETY, RETRIEVAL, PRETREATMENT, AND OTHER PROCESSING NEEDS. THE TWAP WILL IDENTIFY SAMPLING AND ANALYSIS ACTIVITIES PROJECTED FOR THE FOLLOWING FISCAL YEAR. THE TWAP WILL DESCRIBE THE TCPs TO BE ISSUED FOR THE YEAR. THE TCPs WILL COVER SAMPLING AND ANALYSIS ACTIVITIES FOR EACH DST AND SST TO BE CHARACTERIZED IN THE FOLLOWING FISCAL YEAR. THE TWAP WILL ALSO IDENTIFY THE FOLLOWING YEAR'S TCRs TO BE SUBMITTED AND ON WHAT TYPE OF DATA THEY WILL BE BASED. THE TWAP WILL SPECIFY THE CONTENTS OF THESE TCRs. THE TWAP AND TCPs WILL BE DEVELOPED VIA A DQO PROCESS INVOLVING EPA, ECOLOGY, AND USDOE PRIOR TO IMPLEMENTATION. IF THE THREE PARTIES DO NOT AGREE ON ANY INDIVIDUAL TCP THEN ECOLOGY WILL ISSUE A FINAL DECISION BY SEPTEMBER 30 OF THAT YEAR FOR THE SCOPE OF THE PLAN. USDOE WILL IMPLEMENT THE FINAL DECISION. IF USDOE DISPUTES THE FINAL DECISION THE ECOLOGY FINAL DECISION WILL BE IMPLEMENTED DURING THE DISPUTE RESOLUTION PROCESS.	8/31/1995
M-44-02C	SUBMIT TWAP ANNUALLY TO ECOLOGY AND EPA FOR APPROVAL. THE TWAP WILL COVER SAFETY, RETRIEVAL, PRETREATMENT, AND OTHER PROCESSING NEEDS. THE TWAP WILL IDENTIFY SAMPLING AND ANALYSIS ACTIVITIES PROJECTED FOR THE FOLLOWING FISCAL YEAR. THE TWAP WILL DESCRIBE THE TCPs TO BE ISSUED FOR THE YEAR. THE TCPs WILL COVER SAMPLING AND ANALYSIS ACTIVITIES FOR EACH DST AND SST TO BE CHARACTERIZED IN THE FOLLOWING FISCAL YEAR. THE TWAP WILL ALSO IDENTIFY THE FOLLOWING YEAR'S TCRs TO BE SUBMITTED AND ON WHAT TYPE OF DATA THEY WILL BE BASED. THE TWAP WILL SPECIFY THE CONTENTS OF THESE TCRs. THE TWAP AND TCPs WILL BE DEVELOPED VIA A DQO PROCESS INVOLVING EPA, ECOLOGY, AND USDOE PRIOR TO IMPLEMENTATION. IF THE THREE PARTIES DO NOT AGREE ON ANY INDIVIDUAL TCP THEN ECOLOGY WILL ISSUE A FINAL DECISION BY SEPTEMBER 30 OF THAT YEAR FOR THE SCOPE OF THE PLAN. USDOE WILL IMPLEMENT THE FINAL DECISION. IF USDOE DISPUTES THE FINAL DECISION THE ECOLOGY FINAL DECISION WILL BE IMPLEMENTED DURING THE DISPUTE RESOLUTION PROCESS.	8/31/1996
M-44-02D	SUBMIT TWAP ANNUALLY TO ECOLOGY AND EPA FOR APPROVAL. THE TWAP WILL COVER SAFETY, RETRIEVAL, PRETREATMENT, AND OTHER PROCESSING NEEDS. THE TWAP WILL IDENTIFY SAMPLING AND ANALYSIS ACTIVITIES PROJECTED FOR THE FOLLOWING FISCAL YEAR. THE TWAP WILL DESCRIBE THE TCPs TO BE ISSUED FOR THE YEAR. THE TCPs WILL COVER SAMPLING AND ANALYSIS ACTIVITIES FOR EACH DST AND SST TO BE CHARACTERIZED IN THE FOLLOWING FISCAL YEAR. THE TWAP WILL ALSO IDENTIFY THE FOLLOWING YEAR'S TCRs TO BE SUBMITTED AND ON WHAT TYPE OF DATA THEY WILL BE BASED. THE TWAP WILL SPECIFY THE CONTENTS OF THESE TCRs. THE	8/31/1997

Table D. Major and Interim Milestones

Number	Milestone	Due Date
	<p>TWAP AND TCPs WILL BE DEVELOPED VIA A DQO PROCESS INVOLVING EPA, ECOLOGY, AND USDOE PRIOR TO IMPLEMENTATION. IF THE THREE PARTIES DO NOT AGREE ON ANY INDIVIDUAL TCP THEN ECOLOGY WILL ISSUE A FINAL DECISION BY SEPTEMBER 30 OF THAT YEAR FOR THE SCOPE OF THE PLAN. USDOE WILL IMPLEMENT THE FINAL DECISION. IF USDOE DISPUTES THE FINAL DECISION THE ECOLOGY FINAL DECISION WILL BE IMPLEMENTED DURING THE DISPUTE RESOLUTION PROCESS.</p>	
M-44-02E	<p>SUBMIT TWAP ANNUALLY TO ECOLOGY AND EPA FOR APPROVAL. THE TWAP WILL COVER SAFETY, RETRIEVAL, PRETREATMENT, AND OTHER PROCESSING NEEDS. THE TWAP WILL IDENTIFY SAMPLING AND ANALYSIS ACTIVITIES PROJECTED FOR THE FOLLOWING FISCAL YEAR. THE TWAP WILL DESCRIBE THE TCPs TO BE ISSUED FOR THE YEAR. THE TCPs WILL COVER SAMPLING AND ANALYSIS ACTIVITIES FOR EACH DST AND SST TO BE CHARACTERIZED IN THE FOLLOWING FISCAL YEAR. THE TWAP WILL ALSO IDENTIFY THE FOLLOWING YEAR'S TCRs TO BE SUBMITTED AND ON WHAT TYPE OF DATA THEY WILL BE BASED. THE TWAP WILL SPECIFY THE CONTENTS OF THESE TCRs. THE TWAP AND TCPs WILL BE DEVELOPED VIA A DQO PROCESS INVOLVING EPA, ECOLOGY, AND USDOE PRIOR TO IMPLEMENTATION. IF THE THREE PARTIES DO NOT AGREE ON ANY INDIVIDUAL TCP THEN ECOLOGY WILL ISSUE A FINAL DECISION BY SEPTEMBER 30 OF THAT YEAR FOR THE SCOPE OF THE PLAN. USDOE WILL IMPLEMENT THE FINAL DECISION. IF USDOE DISPUTES THE FINAL DECISION THE ECOLOGY FINAL DECISION WILL BE IMPLEMENTED DURING THE DISPUTE RESOLUTION PROCESS.</p>	8/31/1998
M-44-02F	<p>SUBMIT TWAP ANNUALLY TO ECOLOGY AND EPA FOR APPROVAL. THE TWAP WILL COVER SAFETY, RETRIEVAL, PRETREATMENT, AND OTHER PROCESSING NEEDS. THE TWAP WILL IDENTIFY SAMPLING AND ANALYSIS ACTIVITIES PROJECTED FOR THE FOLLOWING FISCAL YEAR. THE TWAP WILL DESCRIBE THE TCPs TO BE ISSUED FOR THE YEAR. THE TCPs WILL COVER SAMPLING AND ANALYSIS ACTIVITIES FOR EACH DST AND SST TO BE CHARACTERIZED IN THE FOLLOWING FISCAL YEAR. THE TWAP WILL ALSO IDENTIFY THE FOLLOWING YEAR'S TCRs TO BE SUBMITTED AND ON WHAT TYPE OF DATA THEY WILL BE BASED. THE TWAP WILL SPECIFY THE CONTENTS OF THESE TCRs. THE TWAP AND TCPs WILL BE DEVELOPED VIA A DQO PROCESS INVOLVING EPA, ECOLOGY, AND USDOE PRIOR TO IMPLEMENTATION. IF THE THREE PARTIES DO NOT AGREE ON ANY INDIVIDUAL TCP THEN ECOLOGY WILL ISSUE A FINAL DECISION BY SEPTEMBER 30 OF THAT YEAR FOR THE SCOPE OF THE PLAN. USDOE WILL IMPLEMENT THE FINAL DECISION. IF USDOE DISPUTES THE FINAL DECISION THE ECOLOGY FINAL DECISION WILL BE IMPLEMENTED DURING THE DISPUTE RESOLUTION PROCESS.</p>	8/31/1999

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-44-03	SUBMIT THREE TCRs FOR INITIAL EVALUATION AND APPROVAL.	10/31/1993 (Completed)
M-44-04	COMPLETE INPUT OF CHARACTERIZATION INFORMATION FOR 3 HLW TANKS TO ELECTRONIC DATABASE(S).	1/31/1994 (Completed)
M-44-05	ISSUE 20 TCRs IN ACCORDANCE WITH THE APPROVED TCPs. IF AN APPROVED TCP IS NOT ISSUED, THE TCRs MUST BE APPROVED BY ECOLOGY AND EPA.	9/30/1994
M-44-06	COMPLETE INPUT OF CHARACTERIZATION INFORMATION FOR 20 HLW TANKS TO ELECTRONIC DATABASE(S).	9/30/1994
M-44-07	COMPLETE ALL FY 1992 AND 1993 CORE SAMPLE ANALYSES AND COMPLETE VALIDATION OF THE RESULTING DATA.	3/31/1994 (Completed)
M-44-08	ISSUE 30 TCRs IN ACCORDANCE WITH THE APPROVED TCPs. COMPLETE INPUT OF CHARACTERIZATION INFORMATION FOR 30 HLW TANKS TO ELECTRONIC DATABASE(S).	9/30/1995
M-44-09	ISSUE 40 TCRs IN ACCORDANCE WITH THE APPROVED TCPs. COMPLETE INPUT OF CHARACTERIZATION INFORMATION FOR 40 HLW TANKS TO ELECTRONIC DATABASE(S).	9/30/1996
M-44-10	ISSUE 40 TCRs IN ACCORDANCE WITH THE APPROVED TCPs. COMPLETE INPUT OF CHARACTERIZATION INFORMATION FOR 40 HLW TANKS TO ELECTRONIC DATABASE(S).	9/30/1997
M-44-11	ISSUE 30 TCRs IN ACCORDANCE WITH THE APPROVED TCPs. COMPLETE INPUT OF CHARACTERIZATION INFORMATION FOR 30 HLW TANKS TO ELECTRONIC DATABASE(S).	9/30/1998
M-44-12	ISSUE 14 TCRs IN ACCORDANCE WITH THE APPROVED TCPs. COMPLETE INPUT OF CHARACTERIZATION INFORMATION FOR 14 HLW TANKS TO ELECTRONIC DATABASE(S).	9/30/1999
M-45-00	COMPLETE CLOSURE OF ALL SINGLE SHELL TANK FARMS.  CLOSURE WILL FOLLOW RETRIEVAL OF AS MUCH TANK WASTE AS TECHNICALLY POSSIBLE, WITH TANK WASTE RESIDUES NOT TO EXCEED 360 CUBIC FEET (CU. FT.) IN EACH OF THE 100 SERIES TANKS, 30 CU. FT. IN EACH OF THE 200 SERIES TANKS, OR THE LIMIT OF WASTE RETRIEVAL TECHNOLOGY CAPABILITY, WHICHEVER IS LESS. IF THE DOE BELIEVES THAT WASTE RETRIEVAL TO THESE LEVELS IS NOT POSSIBLE FOR A TANK, THEN DOE WILL SUBMIT A DETAILED EXPLANATION TO EPA AND ECOLOGY EXPLAINING WHY THESE LEVELS CANNOT BE ACHIEVED, AND SPECIFYING THE QUANTITIES OF WASTE THAT THE DOE PROPOSES TO LEAVE IN THE TANK. THE REQUEST WILL BE APPROVED OR DISAPPROVED BY EPA AND ECOLOGY ON A TANK-BY-TANK BASIS. PROCEDURES FOR	9/30/2024

Table D. Major and Interim Milestones

Number	Milestone	Due Date
	<p>MODIFYING THE RETRIEVAL CRITERIA LISTED ABOVE, AND FOR PROCESSING WAIVER REQUESTS ARE OUTLINED IN THE APPENDIX TO THIS CHANGE REQUEST.</p> <p>FOLLOWING COMPLETION OF RETRIEVAL, SIX OPERABLE UNITS (TANK FARMS), AS DESCRIBED IN APPENDIX C (200-BP-7, 200-PO-3, 200-RO-4, 200-TP-5, 200-TP-6, 200-UP-3), WILL BE REMEDIATED IN ACCORDANCE WITH THE APPROVED CLOSURE PLANS. FINAL CLOSURE OF THE OPERABLE UNITS (TANKS FARMS) SHALL BE DEFINED AS REGULATORY APPROVAL OF COMPLETION OF CLOSURE ACTIONS AND COMMENCEMENT OF POST-CLOSURE ACTIONS.</p> <p>FOR THE PURPOSES OF THIS AGREEMENT ALL UNITS LOCATED WITHIN THE BOUNDARY OF EACH TANK FARM WILL BE CLOSED IN ACCORDANCE WITH WAC 173-303-610. THIS INCLUDES CONTAMINATED SOIL AND ANCILLARY EQUIPMENT THAT WERE PREVIOUSLY DESIGNATED AS RCRA PAST PRACTICE UNITS. ADOPTING THIS APPROACH WILL ENSURE EFFICIENT USE OF FUNDING AND WILL REDUCE POTENTIAL DUPLICATION OF EFFORT VIA APPLICATION OF DIFFERENT REGULATORY REQUIREMENTS: WAC 173-303-610 FOR CLOSURE OF THE TSD UNITS AND RCRA SECTION 3004(U) FOR REMEDIATION OF RCRA PAST PRACTICE UNITS.</p> <p>ALL PARTIES RECOGNIZE THAT THE RECLASSIFICATION OF PREVIOUSLY IDENTIFIED RCRA PAST PRACTICE UNITS TO ANCILLARY EQUIPMENT ASSOCIATED WITH THE TSD UNIT IS STRICTLY FOR APPLICATION OF A CONSISTENT CLOSURE APPROACH. UPGRADES TO PREVIOUSLY CLASSIFIED RCRA PAST PRACTICE UNITS TO ACHIEVE COMPLIANCE WITH RCRA OR DANGEROUS WASTE INTERIM STATUS TECHNICAL STANDARDS FOR TANK SYSTEMS (I.E., SECONDARY CONTAINMENT, INTEGRITY ASSESSMENTS, ETC.) WILL NOT BE MANDATED AS A RESULT OF THIS ACTION. HOWEVER, ANY EQUIPMENT MODIFIED OR REPLACED WILL MEET INTERIM STATUS STANDARDS. IN EVALUATING CLOSURE OPTIONS FOR SINGLE-SHELL TANKS, CONTAMINATED SOIL, AND ANCILLARY EQUIPMENT, ECOLOGY AND EPA WILL CONSIDER COST, TECHNICAL PRACTICABILITY, AND POTENTIAL EXPOSURE TO RADIATION. CLOSURE OF ALL UNITS WITHIN THE BOUNDARY OF A GIVEN TANK FARM WILL BE ADDRESSED IN A CLOSURE PLAN FOR THE SINGLE-SHELL TANKS.</p>	
M-45-01	<p>DEVELOP SINGLE-SHELL TANK (SST) RETRIEVAL TECHNOLOGY.</p> <p>DEVELOP SINGLE-SHELL TANK WASTE RETRIEVAL TECHNOLOGY AND COMPLETE SCALE MODEL TESTING. VARIOUS WASTE RETRIEVAL TECHNOLOGIES WILL BE EVALUATED FOR RETRIEVING EACH OF THE SEVERAL TYPES OF SINGLE-SHELL TANK WASTES. EMPHASIS WILL BE PLACED ON OPTIMIZING WASTE REMOVAL WHILE MINIMIZING PERSONNEL EXPOSURE. PROMISING TECHNOLOGIES WILL BE EVALUATED FOR EACH WASTE TYPE AND</p>	9/30/1994



Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
	ONE OR MORE WILL BE SELECTED FOR TESTING USING SIMULATED WASTE IN A SCALE MODEL (MINIMUM 1:12) TANK.	
M-45-02	SUBMIT ANNUAL UPDATES TO SST RETRIEVAL SEQUENCE DOCUMENT.	9/30/2017
	THIS PROVIDES FOR AN ANNUAL UPDATE OF AN SST RETRIEVAL SEQUENCE DOCUMENT THAT WILL DEFINE THE TANK SELECTION CRITERIA, TANK SELECTION RATIONALE, REFERENCE RETRIEVAL METHOD(S) FOR EACH TANK, AND THE ESTIMATED RETRIEVAL SCHEDULES. THE ANNUAL UPDATES WILL BE SUBMITTED TO ECOLOGY FOR APPROVAL.	
M-45-02A	SUBMIT INITIAL SST RETRIEVAL SEQUENCE DOCUMENT FOR ECOLOGY APPROVAL.	9/30/1996
M-45-02B	SUBMIT ANNUAL UPDATE OF SST RETRIEVAL SEQUENCE DOCUMENT FOR ECOLOGY APPROVAL.	9/30/1997
M-45-02C	SUBMIT ANNUAL UPDATE OF SST RETRIEVAL SEQUENCE DOCUMENT FOR ECOLOGY APPROVAL.	9/30/1998
M-45-02D	SUBMIT ANNUAL UPDATE OF SST RETRIEVAL SEQUENCE DOCUMENT FOR ECOLOGY APPROVAL.	9/30/1999
M-45-02E	SUBMIT ANNUAL UPDATE OF SST RETRIEVAL SEQUENCE DOCUMENT FOR ECOLOGY APPROVAL.	9/30/2000
M-45-02F	SUBMIT ANNUAL UPDATE OF SST RETRIEVAL SEQUENCE DOCUMENT FOR ECOLOGY APPROVAL.	9/30/2001
M-45-02G	SUBMIT ANNUAL UPDATE OF SST RETRIEVAL SEQUENCE DOCUMENT FOR ECOLOGY APPROVAL.	9/30/2002
M-45-02H	SUBMIT ANNUAL UPDATE OF SST RETRIEVAL SEQUENCE DOCUMENT FOR ECOLOGY APPROVAL.	9/30/2003
M-45-02I	SUBMIT ANNUAL UPDATE OF SST RETRIEVAL SEQUENCE DOCUMENT FOR ECOLOGY APPROVAL.	9/30/2004
M-45-02J	SUBMIT ANNUAL UPDATE OF SST RETRIEVAL SEQUENCE DOCUMENT FOR ECOLOGY APPROVAL.	9/30/2005
M-45-02K	SUBMIT ANNUAL UPDATE OF SST RETRIEVAL SEQUENCE DOCUMENT FOR ECOLOGY APPROVAL.	9/30/2006
M-45-02L	SUBMIT ANNUAL UPDATE OF SST RETRIEVAL SEQUENCE DOCUMENT FOR ECOLOGY APPROVAL.	9/30/2007
M-45-02M	SUBMIT ANNUAL UPDATE OF SST RETRIEVAL SEQUENCE DOCUMENT FOR ECOLOGY APPROVAL.	9/30/2008

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-45-02N	SUBMIT ANNUAL UPDATE OF SST RETRIEVAL SEQUENCE DOCUMENT FOR ECOLOGY APPROVAL.	9/30/2009
M-45-02O	SUBMIT ANNUAL UPDATE OF SST RETRIEVAL SEQUENCE DOCUMENT FOR ECOLOGY APPROVAL.	9/30/2010
M-45-02P	SUBMIT ANNUAL UPDATE OF SST RETRIEVAL SEQUENCE DOCUMENT FOR ECOLOGY APPROVAL.	9/30/2011
M-45-02Q	SUBMIT ANNUAL UPDATE OF SST RETRIEVAL SEQUENCE DOCUMENT FOR ECOLOGY APPROVAL.	9/30/2012
M-45-02R	SUBMIT ANNUAL UPDATE OF SST RETRIEVAL SEQUENCE DOCUMENT FOR ECOLOGY APPROVAL.	9/30/2013
M-45-02S	SUBMIT ANNUAL UPDATE OF SST RETRIEVAL SEQUENCE DOCUMENT FOR ECOLOGY APPROVAL.	9/30/2014
M-45-02T	SUBMIT ANNUAL UPDATE OF SST RETRIEVAL SEQUENCE DOCUMENT FOR ECOLOGY APPROVAL.	9/30/2015
M-45-02U	SUBMIT ANNUAL UPDATE OF SST RETRIEVAL SEQUENCE DOCUMENT FOR ECOLOGY APPROVAL.	9/30/2016
M-45-02V	SUBMIT ANNUAL UPDATE OF SST RETRIEVAL SEQUENCE DOCUMENT FOR ECOLOGY APPROVAL.	9/30/2017
M-45-03-T01	COMPLETE SST WASTE RETRIEVAL DEMONSTRATION.  INITIATE AND COMPLETE A FULL SCALE DEMONSTRATION OF SST RETRIEVAL TECHNOLOGY. THIS DEMONSTRATION WILL BE CONSIDERED COMPLETE WHEN NO LESS THAN 99% OF THE WASTE INVENTORY IS REMOVED FROM THE TANK.	9/30/2003
M-45-03-T02	INITIATE FINAL RETRIEVAL DEMONSTRATION OF C-106.  INITIATE FINAL RETRIEVAL OF TANK 241-C-106 TO COMPLETE INITIAL DEMONSTRATION OF SST RETRIEVAL TECHNOLOGIES.	6/30/2002
M-45-03A	INITIATE SLUICING RETRIEVAL OF C-106.  INITIATE SLUICING RETRIEVAL OF TANK 241-C-106 TO RESOLVE THE HIGH-HEAT SAFETY ISSUE AND DEMONSTRATE WASTE RETRIEVAL.	10/31/1997
M-45-04-T01	PROVIDE INITIAL SINGLE-SHELL TANK RETRIEVAL SYSTEMS.  COMPLETE CONSTRUCTION AND RELATED TESTING OF THE INITIAL SST RETRIEVAL SYSTEMS. THIS MILESTONE WILL PROVIDE RETRIEVAL SYSTEMS FOR AN ENTIRE SINGLE-SHELL TANK FARM OR AN EQUIVALENT NUMBER OF TANKS.	11/30/2003
M-45-04-T02	COMPLETE DESIGN FOR THE INITIAL SST RETRIEVAL SYSTEMS.	12/31/2000

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Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-45-04-T03	COMPLETE CONSTRUCTION FOR THE INITIAL SST RETRIEVAL SYSTEMS.	6/30/2003
M-45-04A	COMPLETE CONCEPTUAL DESIGN FOR THE INITIAL SST RETRIEVAL SYSTEMS.	4/30/1997
M-45-05	RETRIEVE WASTE FROM ALL REMAINING SINGLE-SHELL TANKS.  COMPLETE WASTE RETRIEVAL FROM ALL REMAINING SINGLE-SHELL TANKS. RETRIEVAL STANDARDS AND COMPLETION DEFINITIONS ARE PROVIDED UNDER THE MAJOR MILESTONE. THE SCHEDULE REFLECTS RETRIEVAL ACTIVITIES ON A FARM-BY-FARM BASIS. IT ALSO ALLOWS FLEXIBILITY TO RETRIEVE TANKS FROM VARIOUS FARMS IF DESIRED TO SUPPORT SAFETY ISSUE RESOLUTION, PRETREATMENT OR DISPOSAL FEED REQUIREMENTS, OR OTHER PRIORITIES.	9/30/2018
M-45-05-T01	INITIATE TANK WASTE RETRIEVAL FROM ONE SINGLE-SHELL TANK.	12/31/2003
M-45-05-T02	INITIATE TANK RETRIEVAL FROM TWO ADDITIONAL SINGLE-SHELL TANKS.	9/30/2004
M-45-05-T03	INITIATE TANK RETRIEVAL FROM THREE ADDITIONAL SINGLE-SHELL TANKS.	9/30/2005
M-45-05-T04	INITIATE TANK RETRIEVAL FROM FOUR ADDITIONAL SINGLE-SHELL TANKS.	9/30/2006
M-45-05-T05	INITIATE TANK RETRIEVAL FROM FIVE ADDITIONAL SINGLE-SHELL TANKS.	9/30/2007
M-45-05-T06	INITIATE TANK RETRIEVAL FROM FIVE ADDITIONAL SINGLE-SHELL TANKS.	9/30/2008
M-45-05-T07	INITIATE TANK RETRIEVAL FROM SEVEN ADDITIONAL SINGLE-SHELL TANKS.	9/30/2009
M-45-05-T08	INITIATE TANK RETRIEVAL FROM EIGHT ADDITIONAL SINGLE-SHELL TANKS.	9/30/2010
M-45-05-T09	INITIATE TANK RETRIEVAL FROM TEN ADDITIONAL SINGLE-SHELL TANKS.	9/30/2011
M-45-05-T10	INITIATE TANK RETRIEVAL FROM 12 ADDITIONAL SINGLE-SHELL TANKS.	9/30/2012
M-45-05-T11	INITIATE TANK RETRIEVAL FROM 14 ADDITIONAL SINGLE-SHELL TANKS.	9/30/2013
M-45-05-T12	INITIATE TANK RETRIEVAL FROM 17 ADDITIONAL SINGLE-SHELL TANKS.	9/30/2014

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-45-05-T13	INITIATE TANK RETRIEVAL FROM 20 ADDITIONAL SINGLE-SHELL TANKS.	9/30/2015
M-45-05-T14	INITIATE TANK RETRIEVAL FROM 20 ADDITIONAL SINGLE-SHELL TANKS.	9/30/2016
M-45-05-T15	INITIATE TANK RETRIEVAL FROM 20 ADDITIONAL SINGLE-SHELL TANKS.	9/30/2017
M-45-06	COMPLETE CLOSURE OF ALL SINGLE-SHELL TANK FARMS.  THE SINGLE-SHELL TANK CLOSURE WORK PLAN WILL BE PREPARED DESCRIBING THE WORK INTEGRATION PROCESS FOR SINGLE-SHELL TANK CLOSURES AND STATUS OF WORK AND INTEGRATION PROCESS. KNOWN ISSUES WILL BE IDENTIFIED AND AN EXPLANATION WILL BE GIVEN ON HOW THESE ISSUES ARE BEING ADDRESSED. THIS WORK PLAN WILL BE PROVIDED TO ECOLOGY FOR REVIEW/COMMENT AND WILL BE USED AS A ROADMAP FOR CLOSURE OF THE SINGLE-SHELL TANKS. BECAUSE OF THE UNCERTAINTIES IN THE CLOSURE PROCESS, THE WORK PLAN WILL EVOLVE AS THESE UNCERTAINTIES ARE RESOLVED AND EVENTUALLY IT WILL BECOME THE SST CLOSURE/POST-CLOSURE PLAN(S) ISSUED FOR ECOLOGY'S APPROVAL UNDER SUBSEQUENT TPA INTERIM MILESTONES. MAJOR WORK AREAS COVERED IN THE WORK PLAN WILL INCLUDE WASTE RETRIEVAL, OPERABLE UNITS CHARACTERIZATION, TECHNOLOGIES DEVELOPMENT TO SUPPORT CLOSURE, REGULATORY PATHWAY AND STRATEGY FOR ACHIEVING CLOSURE.	9/30/2024
M-45-06-T01	SUBMIT TANK CLOSURE/POST-CLOSURE PLAN FOR SELECTED CLOSURE DEMONSTRATION OPERABLE UNIT OR TANK FARM TO ECOLOGY FOR APPROVAL.	11/30/2004
M-45-06-T02	ECOLOGY WILL ISSUE FINAL CLOSURE/POST CLOSURE PLAN FOR SELECTED CLOSURE DEMONSTRATION OPERABLE UNIT OR TANK FARM.	9/30/2006
M-45-06-T03	INITIATE CLOSURE ACTIONS ON AN OPERABLE UNIT OR TANK FARM BASIS. CLOSURE SHALL FOLLOW COMPLETION OF THE RETRIEVAL ACTIONS UNDER PROPOSED MILESTONE M-45-05. CLOSURE WILL BE DEFINED IN AN APPROVED CLOSURE PLAN FOR THE DEMONSTRATION FARM. FINAL CLOSURE IS DEFINED AS REGULATORY APPROVAL OF COMPLETION OF CLOSURE ACTIONS.	3/31/2012
M-45-06-T04	COMPLETE CLOSURE ACTIONS ON ONE OPERABLE UNIT OR TANK FARM.	3/31/2014
M-45-07	COMPLETE EVALUATION AND DEMONSTRATION TESTING OF SMALL SCALE SUB-SURFACE BARRIERS.  DOE WILL ASSESS THE RISK TO THE ENVIRONMENT DUE TO TANK WASTE REMEDIATION. DOE WITH CONCURRENCE FROM ECOLOGY AND EPA WILL EVALUATE BARRIER TECHNOLOGY AS A MEANS TO	9/30/1997

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Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
	MINIMIZE THOSE RISKS AND VENDOR CAPABILITIES TO DEPLOY AND TEST BARRIERS IN HANFORD SOILS. RETRIEVAL OF WASTE FROM TANK 241-C-106 WILL PROCEED WITHOUT A BARRIER.	
M-45-07-T01	ESTABLISH PERFORMANCE CRITERIA AND TEST SPECIFICATIONS.	3/31/1995
	ECOLOGY, EPA, AND DOE ESTABLISH AND REACH AGREEMENT ON PERFORMANCE CRITERIA, AND TEST SPECIFICATIONS TO BE USED FOR THE SMALL SCALE DEMONSTRATION OF SUB-SURFACE BARRIER TECHNOLOGIES.	
M-45-07-T02	INITIATE DEMONSTRATION TESTING OF SELECTED SUB-SURFACE BARRIER TECHNOLOGIES.	10/31/1995
	TESTING OF ONE OR MORE SMALL SCALE SUB-SURFACE BARRIER TECHNOLOGIES WILL BE INITIATED AT A HANFORD TEST SITE. DOCUMENTATION WILL BE COMPLETED PRIOR TO TESTING WHICH WILL INCORPORATE PERFORMANCE CRITERIA AND TEST SPECIFICATIONS. INITIATION OF DEMONSTRATION IS DEFINED AS COMPLETION OF CONSTRUCTION AND INITIATION OF TEST PROCEDURES.	
M-45-07-T03	COMPLETE EVALUATION OF SUB-SURFACE BARRIER DEMONSTRATION TEST RESULTS.	3/31/1997
	TEST DATA AND RELATED INFORMATION WILL BE PROVIDED TO ECOLOGY, EPA, AND DOE AS IT BECOMES AVAILABLE DURING TESTING. SUB-SURFACE BARRIER TECHNOLOGIES WILL BE EVALUATED AGAINST THE PERFORMANCE CRITERIA AND TEST SPECIFICATIONS.	
M-45-07-T04	REACH DECISION ON WHETHER TO PROCEED WITH SUB-SURFACE BARRIER PROGRAM.	6/30/1997
	ECOLOGY, EPA, AND DOE WILL MAKE A DECISION ON WHETHER TO PROCEED WITH INSTALLATION OF A FULL-SCALE SUB-SURFACE BARRIER TO SUPPORT SST RETRIEVAL UNDER MILESTONE M-45-07. IF THE DECISION IS NEGATIVE, THEN MILESTONE M-45-07 WILL BE CONSIDERED COMPLETE.	
M-45-07A	COMPLETE EVALUATION OF SUB-SURFACE BARRIER FEASIBILITY.	9/30/1994
	COMPLETE A FEASIBILITY STUDY OF BARRIERS TO ACCOMPLISH THE FOLLOWING:	
	1) ESTIMATE THE POTENTIAL ENVIRONMENTAL IMPACT OF WASTE STORAGE AND RETRIEVAL ACTIVITIES WITHOUT THE APPLICATION OF BARRIERS.	

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
	2) ESTABLISH FUNCTIONAL REQUIREMENTS OF BARRIERS TO MINIMIZE THE IMPACT ASSOCIATED WITH THE WASTE STORAGE AND RETRIEVAL ACTIVITIES.	
	3) EVALUATE THE APPLICATION OF EXISTING SUB-SURFACE BARRIER TECHNOLOGIES TO MEET FUNCTIONAL REQUIREMENTS OF BARRIERS AND THE POTENTIAL REDUCTION IN ENVIRONMENTAL IMPACTS FROM THE APPLICATION OF BARRIERS TO SST WASTE STORAGE AND RETRIEVAL ACTIVITIES.	
M-45-07B	REACH DECISION ON WHETHER TO PROCEED WITH DEMONSTRATION.	1/31/1995
	BASED ON THE RESULTS OF THE SUB-SURFACE BARRIER FEASIBILITY STUDY, ECOLOGY, EPA, AND DOE WILL MAKE A DECISION ON WHETHER TO PROCEED WITH A SUB-SCALE DEMONSTRATION. IF THE DECISION IS NEGATIVE, THEN INTERIM MILESTONE M-45-07 WILL BE CONSIDERED COMPLETE.	
M-45-07C	ESTABLISH NEW MILESTONES FOR SUB-SURFACE BARRIER IMPLEMENTATION.	9/30/1997
	ECOLOGY, EPA, AND DOE WILL NEGOTIATE AND REACH AGREEMENT ON NEW MILESTONES TO SUPPORT MILESTONE M-45-07 AND A PROGRAM TO INSTALL SUB-SURFACE BARRIERS IN SST FARMS OR INDIVIDUAL TANKS TO SUPPORT SST RETRIEVAL SCHEDULES UNDER M-45-00. NEW MILESTONES WILL INCLUDE COMPLETION OF CONSTRUCTION OF A FULL-SCALE SUB-SURFACE BARRIER IN A TANK FARM, IN CONJUNCTION WITH THE INSTALLATION OF THE RETRIEVAL SYSTEMS PURSUANT TO M-45-04-T03 (COMPLETE CONSTRUCTION FOR THE INITIAL SST RETRIEVAL SYSTEMS).	
M-46-00A	DOUBLE-SHELL TANK SPACE EVALUATION.	9/30/1994
M-46-00B	DOUBLE-SHELL TANK SPACE EVALUATION.	9/30/1995
M-46-00C	DOUBLE-SHELL TANK SPACE EVALUATION.	9/30/1996
M-46-00D	DOUBLE-SHELL TANK SPACE EVALUATION.	9/30/1997
M-46-00E	DOUBLE-SHELL TANK SPACE EVALUATION.	9/30/1998
M-46-00F	DOUBLE-SHELL TANK SPACE EVALUATION.	9/30/1999
M-46-00G	DOUBLE-SHELL TANK SPACE EVALUATION.	9/30/2000
M-46-00H	DOUBLE-SHELL TANK SPACE EVALUATION.	9/30/2001
M-46-00I	DOUBLE-SHELL TANK SPACE EVALUATION.	9/30/2002
M-46-00J	DOUBLE-SHELL TANK SPACE EVALUATION.	9/30/2003

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-46-00K	DOUBLE-SHELL TANK SPACE EVALUATION.	9/30/2004
M-46-00L	DOUBLE-SHELL TANK SPACE EVALUATION.	9/30/2005
M-46-00M	DOUBLE-SHELL TANK SPACE EVALUATION.	9/30/2006
M-46-00N	DOUBLE-SHELL TANK SPACE EVALUATION.	9/30/2007
M-46-00O	DOUBLE-SHELL TANK SPACE EVALUATION.	9/30/2008
M-46-00P	DOUBLE-SHELL TANK SPACE EVALUATION.	9/30/2009
M-46-00Q	DOUBLE-SHELL TANK SPACE EVALUATION.	9/30/2010
M-46-00R	DOUBLE-SHELL TANK SPACE EVALUATION.	9/30/2011
M-46-00S	DOUBLE-SHELL TANK SPACE EVALUATION.	9/30/2012
M-46-00T	DOUBLE-SHELL TANK SPACE EVALUATION.	9/30/2013
M-46-00U	DOUBLE-SHELL TANK SPACE EVALUATION.	9/30/2014
M-46-00V	DOUBLE-SHELL TANK SPACE EVALUATION.	9/30/2015
M-46-00W	DOUBLE-SHELL TANK SPACE EVALUATION.	9/30/2016
M-46-00X	DOUBLE-SHELL TANK SPACE EVALUATION.	9/30/2017
M-46-00Y	DOUBLE-SHELL TANK SPACE EVALUATION.	9/30/2018
M-46-00Z	DOUBLE-SHELL TANK SPACE EVALUATION.	9/30/2019
M-46-01A	CONCURRENCE OF ADDITIONAL TANK ACQUISITION	11/30/1994
M-46-01B	CONCURRENCE OF ADDITIONAL TANK ACQUISITION	11/30/1995
M-46-01C	CONCURRENCE OF ADDITIONAL TANK ACQUISITION	11/30/1996
M-46-01D	CONCURRENCE OF ADDITIONAL TANK ACQUISITION	11/30/1997
M-46-01E	CONCURRENCE OF ADDITIONAL TANK ACQUISITION	11/30/1998
M-46-01F	CONCURRENCE OF ADDITIONAL TANK ACQUISITION	11/30/1999
M-46-01G	CONCURRENCE OF ADDITIONAL TANK ACQUISITION	11/30/2000
M-46-01H	CONCURRENCE OF ADDITIONAL TANK ACQUISITION	11/30/2001
M-46-01I	CONCURRENCE OF ADDITIONAL TANK ACQUISITION	11/30/2002
M-46-01J	CONCURRENCE OF ADDITIONAL TANK ACQUISITION	11/30/2003
M-46-01K	CONCURRENCE OF ADDITIONAL TANK ACQUISITION	11/30/2004

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-46-01L	CONCURRENCE OF ADDITIONAL TANK ACQUISITION	11/30/2005
M-46-01M	CONCURRENCE OF ADDITIONAL TANK ACQUISITION	11/30/2006
M-46-01N	CONCURRENCE OF ADDITIONAL TANK ACQUISITION	11/30/2007
M-46-01O	CONCURRENCE OF ADDITIONAL TANK ACQUISITION	11/30/2008
M-46-01P	CONCURRENCE OF ADDITIONAL TANK ACQUISITION	11/30/2009
M-46-01Q	CONCURRENCE OF ADDITIONAL TANK ACQUISITION	11/30/2010
M-46-01R	CONCURRENCE OF ADDITIONAL TANK ACQUISITION	11/30/2011
M-46-01S	CONCURRENCE OF ADDITIONAL TANK ACQUISITION	11/30/2012
M-46-01T	CONCURRENCE OF ADDITIONAL TANK ACQUISITION	11/30/2013
M-46-01U	CONCURRENCE OF ADDITIONAL TANK ACQUISITION	11/30/2014
M-46-01V	CONCURRENCE OF ADDITIONAL TANK ACQUISITION	11/30/2015
M-46-01W	CONCURRENCE OF ADDITIONAL TANK ACQUISITION	11/30/2016
M-46-01X	CONCURRENCE OF ADDITIONAL TANK ACQUISITION	11/30/2017
M-46-01Y	CONCURRENCE OF ADDITIONAL TANK ACQUISITION	11/30/2018
M-46-01Z	CONCURRENCE OF ADDITIONAL TANK ACQUISITION	11/30/2019
M-50-00	COMPLETE PRETREATMENT PROCESSING OF HANFORD TANK WASTE	12/31/2028
M-50-01	START CONSTRUCTION OF LLW PRETREATMENT FACILITY.	11/30/1998
M-50-01-T01	<p>ISSUE REPORTS ON CESIUM REMOVAL PERFORMANCE OF RESORCINOL AND CS-100 RESINS ON MULTIPLE FEEDS.</p> <p>THIS MILESTONE WILL REPORT HANFORD PROGRESS ON LABORATORY TESTING WITH RESORCINOL AND CS-100 RESINS FOR CESIUM REMOVAL. BASED ON THE LABORATORY RESULTS, WHC WILL PREPARE PRELIMINARY Cs ION EXCHANGE FLOWSHEETS ON MULTIPLE WASTE STREAMS, WHICH WILL INCLUDE DSSF AND NCAW SUPERNATANTS. THESE FLOWSHEETS WILL REFLECT THE PRELIMINARY REQUIREMENTS OF THE LOW-LEVEL WASTE PRETREATMENT FACILITY.</p>	12/31/1994
M-50-01-T02	SUBMIT CONCEPTUAL DESIGN AND INITIATE DEFINITIVE DESIGN OF LLW PRETREATMENT FACILITY.	12/31/1996
M-50-02	START HOT OPERATIONS OF LLW PRETREATMENT FACILITY TO REMOVE CESIUM AND STRONTIUM.	12/31/2004
M-50-02-T01	COMPLETE CONSTRUCTION OF LLW PRETREATMENT FACILITY.	12/31/2003



Table D. Major and Interim Milestones

Number	Milestone	Due Date
M-50-03	<p>COMPLETE EVALUATION OF ENHANCED SLUDGE WASHING TO DETERMINE WHETHER ADVANCED SLUDGE SEPARATION PROCESSES ARE REQUIRED.</p> <p>THE PERFORMANCE OF SLUDGE WASHING AND RELATED TANK WASTE SLUDGE PRETREATMENT METHODS WILL BE EVALUATED TO DETERMINE IF THESE PROCESSES WILL BE CAPABLE OF SATISFYING CRITERIA WHICH WILL BE ESTABLISHED BY THE THREE PARTIES PRIOR TO THE MILESTONE DATE. THE CRITERIA WILL INCLUDE SUCH ITEMS AS VOLUME OF HLW RESULTING FROM PRETREATMENT, COMPATIBILITY WITH HLW AND LLW TREATMENT PROCESSES, AND PROCESSING RATES. FOR EXAMPLE, SLUDGE WASHING AND ENHANCED SLUDGE WASHING MUST RESULT IN THE PRODUCTION OF A "REASONABLE" VOLUME OF HLW REQUIRING REPOSITORY DISPOSAL SUCH THAT OTHER ESTABLISHED SLUDGE TREATMENT PROCESSES WILL NOT RESULT IN OVERALL COST SAVINGS OR SCHEDULE IMPROVEMENTS. IF THE PREDICTED PERFORMANCE DOES NOT MEET THE CRITERIA, THE NEED FOR MORE ADVANCED SLUDGE SEPARATIONS PROCESSES WILL BE RE-EXAMINED AND CHANGES TO THE HLW PROGRAM WILL BE PROPOSED ACCORDINGLY. KEY ELEMENTS OF THIS EVALUATION INCLUDE:</p> <ul style="list-style-type: none"> <li>- PRETREATMENT PROCESS TESTING WILL USE ACTUAL TANK WASTE. THESE TANKS WILL BE CHOSEN TO REPRESENT THE EXPECTED RANGE OF SLUDGE COMPOSITION. CANDIDATE PROCESSES ARE THOSE, SUCH AS WATER WASHING, CAUSTIC WASHING, AND SELECTIVE LEACHING, WHICH DO NOT REQUIRE COMPLEX PROCESSING SYSTEMS AND WHICH CAN BE IMPLEMENTED WITHIN TANKS OR RELATIVELY SIMPLE FACILITIES.</li> <li>- DEVELOP CANDIDATE TANK TREATMENT AND BLENDING SEQUENCES TO MINIMIZE THE VOLUME OF IMMOBILIZED HLW.</li> <li>- MODEL SYSTEMS PERFORMANCE TO PREDICT THE VOLUMES OF IMMOBILIZED HLW PRODUCED AND PROCESSING RATES FOR CANDIDATE PRETREATMENT PROCESSES.</li> <li>-ASSESS THE UNCERTAINTIES RELATED TO THE HLW VOLUME PREDICTIONS.</li> </ul>	3/31/1998
M-50-03-T01	<p>ISSUE REPORT ON CURRENT STATUS OF TANK WASTE ENHANCED SLUDGE WASHING</p> <p>THIS MILESTONE WILL REPORT HANFORD PROGRESS IN ENHANCED SLUDGE WASHING. INCLUDED IN THE SCOPE OF THIS MILESTONE WILL BE THE ISSUANCE OF A PLAN THAT WILL DEFINE THE TESTS TO BE PERFORMED ON HANFORD TANK SLUDGES. IN ADDITION, THE ENHANCED SLUDGE WASHING LABORATORY TEST RESULTS ON HANFORD SLUDGES COMPLETED THROUGH THE THIRD QUARTER OF THE FISCAL YEAR WILL BE PRESENTED WITH EXPECTED IMPACTS ON HIGH LEVEL WASTE VITRIFICATION. THESE IMPACTS WILL BE ILLUSTRATED IN A</p>	10/31/1994

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
	SUMMARY OF HLW GLASS VOLUME PROJECTIONS FOR ALL HANFORD WASTE TYPES. FINALLY, THE STATUS AND RESULTS OF COMPUTER MODELLING OF SLUDGE WASHING OF TANK WASTES WILL BE PRESENTED.	
M-50-03-T02	SUBMIT A REPORT SUMMARIZING THE TESTING OF ENHANCED SLUDGE WASHING AND RELATED TANK WASTE SLUDGE PRETREATMENT METHODS FOR SAMPLES OF TANK WASTE SLUDGE.	9/30/1995
	PERFORM TESTING OF ENHANCED SLUDGE WASHING AND RELATED TANK WASTE SLUDGE PRETREATMENT METHODS USING ACTUAL TANK WASTE SAMPLES. DOCUMENT AND ISSUE RESULTS OF TESTING COMPLETED TO THAT TIME.	
	THIS ANNUAL REPORT WILL ALSO DOCUMENT PRELIMINARY CANDIDATE TANK WASTE PRETREATMENT AND PRELIMINARY IMMOBILIZATION SEQUENCES AND TANK BLENDING STRATEGIES. GOALS FOR BOTH EARLY PROGRESS ON WASTE IMMOBILIZATION AND MINIMIZATION OF THE PRODUCTION OF HIGH LEVEL GLASS WILL BE ADDRESSED IN THESE STRATEGIES. THESE PRELIMINARY STRATEGIES WILL BE UTILIZED TO PREDICT THE PRODUCTION OF HIGH LEVEL WASTE GLASS ASSOCIATED WITH CANDIDATE ENHANCED SLUDGE WASHINGS AND RELATED TANK WASTE SLUDGE PRETREATMENT METHODS. THE PREDICTION OF THE HLW GLASS VOLUME PRODUCTION WILL BE UPDATED.	
M-50-03A	DEFINE ADDITIONAL MILESTONES FOR WASTE PRETREATMENT LEADING TO THE DECISION WHETHER ADVANCED SLUDGE SEPARATION PROCESSES ARE REQUIRED (M-50-03).	9/30/1994
	THE DECISION OF WHETHER ADVANCED SLUDGE SEPARATION PROCESSES ARE REQUIRED WILL NEED THE DEVELOPMENT OF INFORMATION FROM SEVERAL TWRS FUNCTIONS (PRETREATMENT, HLW TREATMENT, LLW TREATMENT, AND RETRIEVAL) TO DETERMINE IF ENHANCED SLUDGE WASHING PERFORMS SATISFACTORILY, OR IF ADVANCED SLUDGE SEPARATION PROCESSES ARE REQUIRED. SOME INTERIM INFORMATION TO BE INCLUDED ON THIS SCHEDULE MAY INCLUDE THE DEVELOPMENT OF CRITERIA DEFINING WHAT HLW GLASS VOLUME IS ACCEPTABLE, THE DEVELOPMENT OF THE DECISION-MAKING METHOD; AND THE SCHEDULE TO EVALUATE THE PERFORMANCE OF ENHANCE SLUDGE WASHING AND THE ACCEPTANCE OF THE CRITERIA AND DECISION METHOD BY THE INTERESTED PARTIES. THIS MILESTONE WILL BE SATISFIED WITH THE DEVELOPMENT OF A SCHEDULE LEADING TO THE DECISION. BASED ON THIS SCHEDULE, ADDITIONAL MILESTONES WILL BE PROPOSED TO LEAD TO THE COMPLETION OF MILESTONE M-50-03.	
M-50-04	START HOT OPERATIONS OF HLW PRETREATMENT FACILITY.	6/30/2008
M-50-04-T01	SUBMIT CONCEPTUAL DESIGN OF HLW PRETREATMENT FACILITY	3/31/1998

Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-50-04-T02	INITIATE DEFINITIVE DESIGN OF HLW PRETREATMENT FACILITY.	11/30/1998
M-50-04-T03	START CONSTRUCTION OF HLW PRETREATMENT FACILITY.	6/30/2001
M-51-00	COMPLETE VITRIFICATION OF HANFORD HIGH LEVEL TANK WASTE.	12/31/2028
M-51-01	<p>PROVIDE REPORT TO ECOLOGY AND EPA ON EVALUATION OF ALTERNATIVE CONCEPTS FOR TREATMENT AND DISPOSAL OF HIGH LEVEL HANFORD TANK WASTES.</p> <p>SOME INNOVATIVE APPROACHES, SUCH AS PRIVATIZATION OF THE HIGH-LEVEL WASTE VITRIFICATION FACILITY, HAVE RECENTLY BEEN PROPOSED WHICH MAY HAVE SIGNIFICANT SCHEDULE, COST, OR ENVIRONMENTAL ADVANTAGES WHICH COULD IMPROVE THE NEW PROGRAM STRATEGY.</p> <p>OPTIONS MAY BE IDENTIFIED WHICH HAVE THE POTENTIAL TO SIGNIFICANTLY IMPROVE THE TANK WASTE DISPOSAL STRATEGY. A SYSTEMS ENGINEERING APPROACH WILL BE USED TO DEFINE AND EVALUATE THE OPTIONS. THIS EVALUATION IS NOT INTENDED TO PROVIDE OPTIONS WHICH marginally IMPROVE THE REFERENCE STRATEGY. OPTIONS WHICH MAINTAIN OR ENHANCE ENVIRONMENTAL CONDITIONS AND 1) SIGNIFICANTLY IMPROVE REFERENCE CASE SCHEDULES OR 2) SUBSTANTIALLY REDUCE COST WHILE MAINTAINING OR IMPROVING REFERENCE CASE SCHEDULES WILL BE PROPOSED THROUGH THE APPROVED CHANGE CONTROL PROCESS.</p>	12/31/1994
M-51-01-T01	PROVIDE EPA AND ECOLOGY WITH RESULTS OF EVALUATION AND A DECISION TO PROCEED/NOT PROCEED WITH THE ECA PROPOSAL FOR VITRIFICATION.	6/30/1994
M-51-02	<p>COMPLETE MELTER TESTS AND SELECT REFERENCE MELTER.</p> <p>THIS MILESTONE WILL PROVIDE CONFIRMATION THAT MELTER DEVELOPMENT HAS SUCCESSFULLY PRODUCED A MELTER COMPATIBLE WITH THE SLUDGE PRETREATMENT TECHNOLOGY TO BE DEPLOYED (SEE MILESTONE M-51-03) AND WILL COMPLETE PROCESSING IN THE REQUIRED TIMEFRAME.</p>	9/30/1998
M-51-03	INITIATE HOT OPERATIONS OF THE HLW VITRIFICATION FACILITY	12/31/2009
M-51-03-T01	SUBMIT CONCEPTUAL DESIGN (TO INCLUDE SELECTED CAPACITY AND PROCESS) OF HLW VITRIFICATION FACILITY.	9/30/1998
M-51-03-T02	INITIATE DEFINITIVE DESIGN OF THE HLW VITRIFICATION FACILITY.	12/31/1998
M-51-03-T03	INITIATE CONSTRUCTION OF THE HLW VITRIFICATION FACILITY	6/30/2002

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Table D. Major and Interim Milestones

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-51-03-T04	COMPLETE CONSTRUCTION OF THE HLW VITRIFICATION FACILITY	12/31/2007
M-60-00	COMPLETE VITRIFICATION OF HANFORD LOW LEVEL TANK WASTE.	12/31/2028
M-60-01	BEGIN LLW MELTER TESTING WITH SIMULANTS.	9/30/1994
M-60-01-T01	AWARD CONTRACT WITH FIRST VENDOR TO CONDUCT LLW MELTER TESTS WITH SIMULANTS.	6/30/1994
M-60-01A	DEFINE AND ISSUE LLW SIMULANT RECIPE (AND BASIS) FOR INITIAL MELTER TESTS	5/31/1994
M-60-02	COMPLETE MELTER FEASIBILITY AND SYSTEM OPERABILITY TESTS, SELECT REFERENCE MELTER(S), AND ESTABLISH REFERENCE LLW GLASS FORMULATION WHICH MEETS COMPLETE SYSTEM REQUIREMENTS.	6/30/1996
M-60-03	SUBMIT CONCEPTUAL DESIGN AND INITIATE DEFINITIVE DESIGN OF THE LLW VITRIFICATION FACILITY.	11/30/1996
M-60-03-T01	SUBMIT FACILITY OPTIONS ENGINEERING STUDY.  THIS STUDY WILL INCLUDE AN EVALUATION OF WORKER RADIATION EXPOSURE, RADIONUCLIDE SEPARATION, IN-PROCESS STORAGE, AND SHIELDING REQUIREMENTS.	6/30/1994
M-60-04	INITIATE CONSTRUCTION OF THE LLW VITRIFICATION FACILITY.	12/31/1997
M-60-05	INITIATE HOT OPERATIONS OF THE LLW VITRIFICATION FACILITY.	6/30/2005
M-60-05-T01	COMPLETE CONSTRUCTION OF THE LLW VITRIFICATION FACILITY.	12/31/2003
M-70-00	THE ERDF WILL BE OPERATIONAL (AVAILABLE TO RECEIVE REMEDIATION WASTE) ON SEPTEMBER, 1996.	9/30/1996
M-70-00-T01	SUBMIT A PUBLIC INVOLVEMENT PLAN FOR ERDF.	10/30/1993 (Completed)
M-70-01	SUBMIT A SINGLE-DESIGN ERDF DRAFT CONCEPTUAL DESIGN REPORT (CDR) FOR REGULATORY REVIEW AND COMMENT.	2/28/1994 (Completed)
M-70-02	SUBMIT INFORMATION NECESSARY FOR CAMU DESIGNATION (40 CFR 264) AND A CERCLA ROD FOR REGULATORY APPROVAL.	4/30/1994

## FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

Page 1 of 40

## ACTION PLAN WORK SCHEDULE

MILESTONE LEGEND		CY 1994												CY 1995				1996	1997	1998	1999	2000
MAJOR MILESTONE	TARGET DATE INTERIM	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	1 QTR	2 QTR	3 QTR	4 QTR					
M-01-00 COMPLETE M-GHOUT CAMPAIGNS OF DOUBLE-SHELL TANK WASTE (DECEMBER 1994)		DELETED BY AMENDMENT FOUR DATED 01/25/94 - REPLACED BY M-60 MILESTONES																				
M-02-00 INITIATE PRE-TREATMENT OF DOUBLE-SHELL TANK WASTE #804		DELETED BY AMENDMENT FOUR DATED 01/25/94 - REPLACED BY M-50 MILESTONES																				
M-03-00 INITIATE HANFORD WASTE VULNERABILITY AND OPERATIONS EXERCISES (DECEMBER 1994)		DELETED BY AMENDMENT FOUR DATED 01/25/94 - REPLACED BY M-51 MILESTONES																				
M-04-00 PROVIDE ANNUAL REPORTS OF TANK WASTE TREATABILITY STUDIES (ANNUALLY)		DELETED BY AMENDMENT FOUR DATED 01/25/94																				
M-05-00 COMPLETE SINGLE-SHELL TANK WASTE STABILIZATION (SEPTEMBER 1995)		DELETED BY AMENDMENT FOUR DATED 01/25/94 - REPLACED BY M-41 MILESTONES																				
M-06-00 DEVELOP SINGLE-SHELL TANK WASTE RETRIEVAL TECHNOLOGY AND COMPLETE SCALE-MODEL TESTING (JUNE 1994)		DELETED BY AMENDMENT FOUR DATED 01/25/94 - REPLACED BY M-45 MILESTONES																				
M-07-00 INITIATE FULL-SCALE DEMONSTRATION OF WASTE RETRIEVAL TECHNOLOGY (OCTOBER 1997)		DELETED BY AMENDMENT FOUR DATED 01/25/94 - REPLACED BY M-45 MILESTONES																				
M-08-00 INITIATE FULL-SCALE TANK FARM CLOSURE DEMONSTRATION PROJECT (JUNE 2004)		DELETED BY AMENDMENT FOUR DATED 01/25/94 - REPLACED BY M-45 MILESTONES																				

NOTE: THIS SCHEDULE PROVIDES A 7-YEAR GRAPHIC PRESENTATION OF THE MILESTONES AND TARGET DATES CONTAINED WITHIN THE HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

NOTE: THIS SCHEDULE PROVIDES A 7-YEAR  
GRAPHIC PRESENTATION OF THE  
MILESTONES AND TARGET DATES  
CONTAINED WITHIN THE HANFORD  
FEDERAL FACILITY AGREEMENT  
AND CONSENT ORDER

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FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

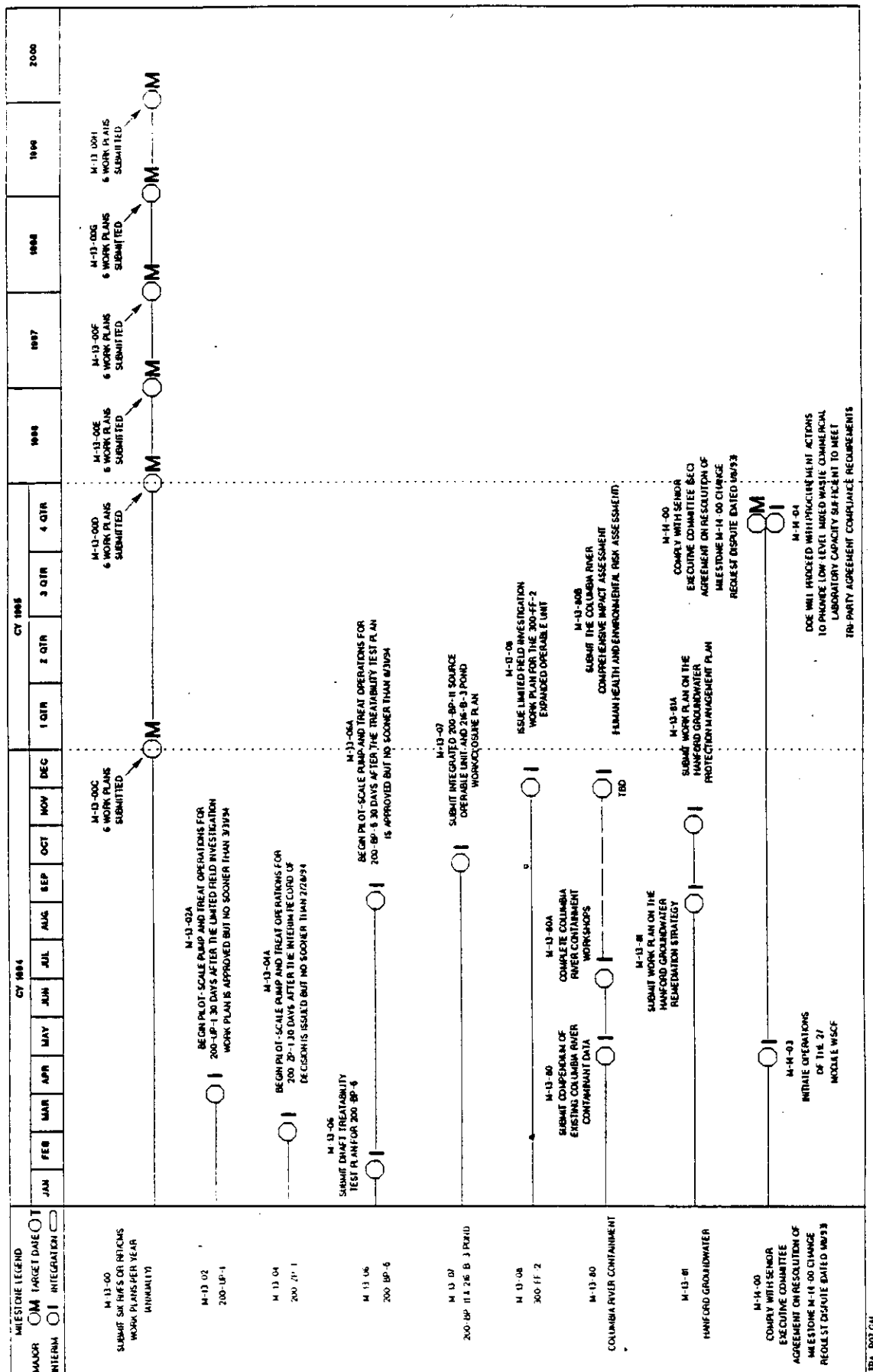
ACTION PLAN WORK SCHEDULE

MILESTONE LEGEND		CY 1993												CY 1994				1995	1996	1997	1998	1999			
MAJOR	OM TARGET DATE	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	1 QTR	2 QTR	3 QTR	4 QTR								
INTERIM	OI INTERACTION																								
M 03 00	COMPLETE CLOSURE OF ALL H9 STEEL-SHELL TANKS (JUNE 2008)	DELETED BY AMENDMENT FOUR DATED 07/24/94 - REPLACED BY M-45 MILESTONES																							
M 10 00	COMPLETE ANALYSIS OF ALL 451 TWO CONTAINER CORE SAMPLES FROM ECH1 STEEL-SHELL TANK (SEPTEMBER 1996)	FILLIED BY AMENDMENT FOUR DATED 07/24/94 - REPLACED BY M-46 MILESTONES																							
M 11 00	COMPLETE CONSTRUCTION & INITIAL OPERATIONS OF EXPANDED LABORATORY HOT CELLS FOR HIGH-LEVEL RADIOACTIVE WASTE (JUNE 1994)	M 11 00-101 COMPLETE CONSTRUCTION M 11 00 COMPLETE CONSTRUCTION & INITIAL OPERATIONS OF EXPANDED LABORATORY HOT CELLS FOR HIGH-LEVEL RADIOACTIVE WASTE (JUNE 1994)																							
M 12 00	SUBMIT RFS OR AFRICHS WORK PLANS FOR 6 ORFEBLE UNITS (JUNE 1994)	COMPLETED JUNE 1992																							

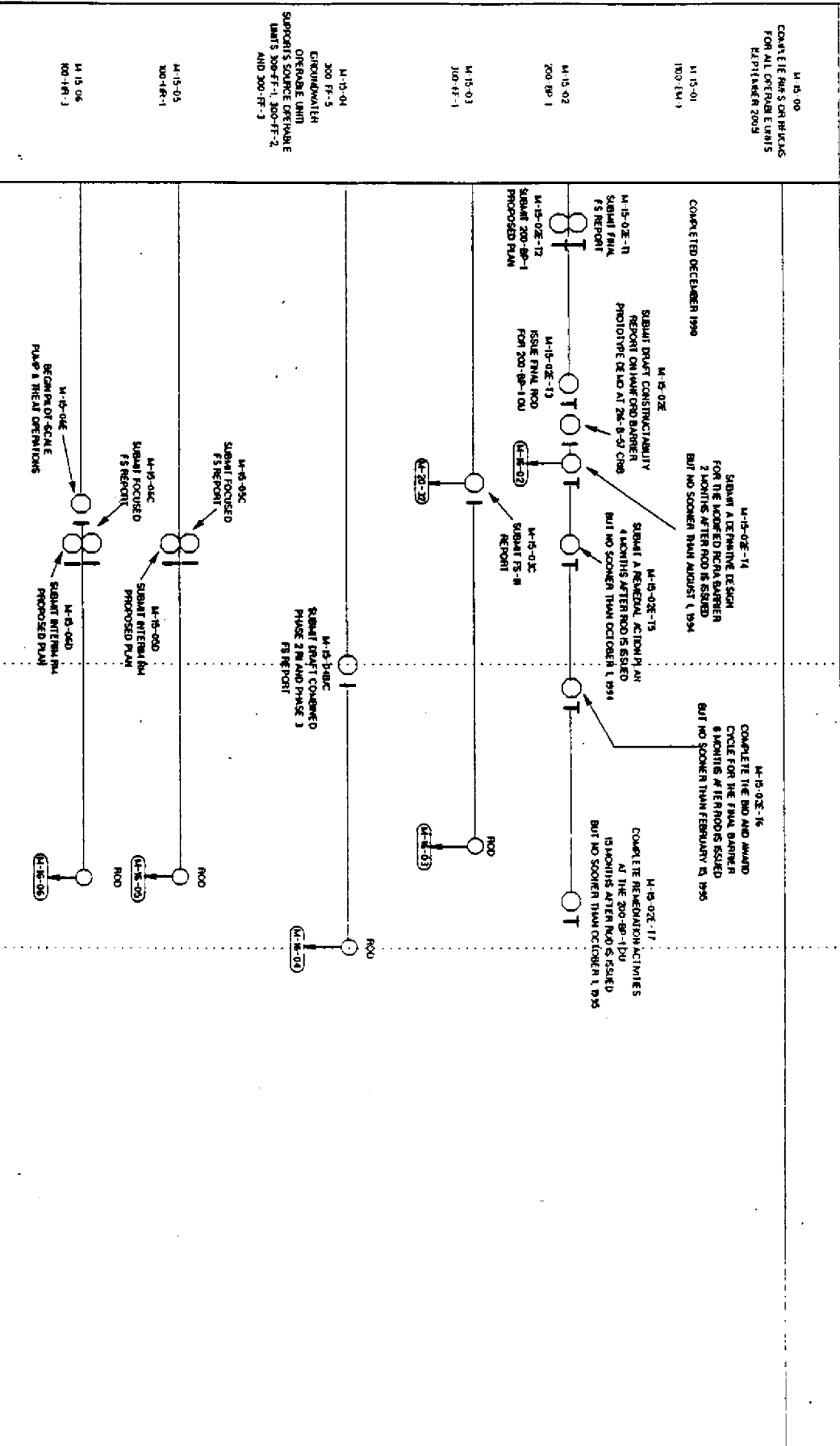
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## FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

## ACTION PLAN WORK SCHEDULE



MESSAGE LEGEND					
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JAN	FEB	MAR	APR	MAY	JUN
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			CY 1994		
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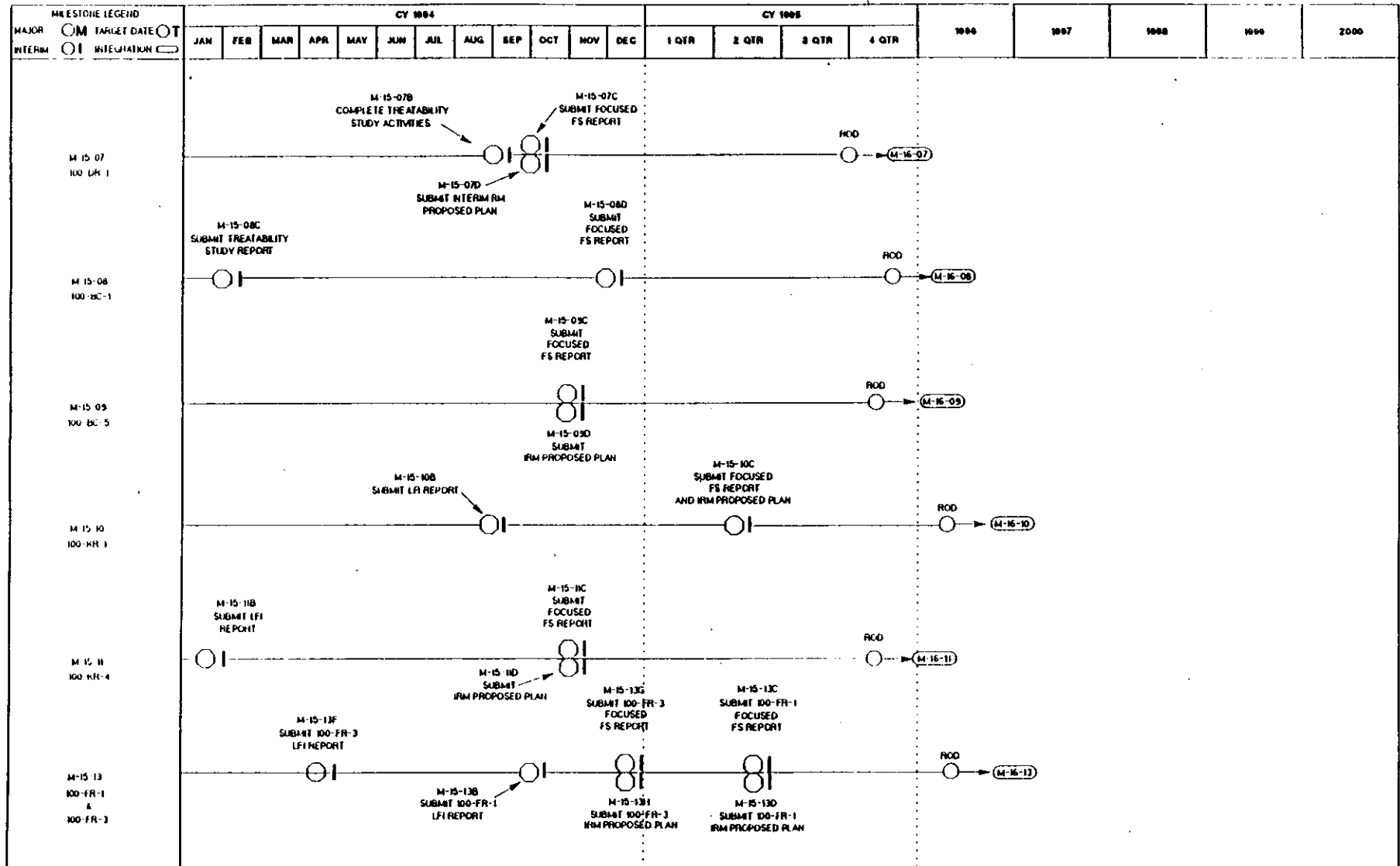




## FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

Page 5 of 40

## ACTION PLAN WORK SCHEDULE



MONTHS RECORD															
CY 1994															
CY 1995															
1996															
1997															
1998															
1999															
2000															
JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	1 QTR	2 QTR	3 QTR	4 QTR



ESTIMATE HEAD																				
JACHN	<input checked="" type="checkbox"/> MAINT ONLY	<input checked="" type="checkbox"/>																		
MTRMNA	<input type="checkbox"/> INFLATION	<input type="checkbox"/>																		
<b>CY 08-1</b>									<b>CY 19-5</b>											
JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	1 QTR	2 QTR	3 QTR	4 QTR	1986	1987	1988	1989	2000

<p>M-17-00 COMPLETE LIQUID EFFLUENT TREATMENT FACILITIES/ARRANGES FOR ALL PHASE 1 STREAMS AND BAYPARK FOR ALL PHASE LIQUID EFFLUENT STREAMS AT THE HAWKWOOD SITE M-17-00A LATE 1991 M-17-00B OCTOBER 1993</p>	<p>M-17-00 COMPLETE LIQUID EFFLUENT TREATMENT FACILITIES/ARRANGES FOR ALL PHASE 1 STREAMS AND BAYPARK FOR ALL PHASE LIQUID EFFLUENT STREAMS AT THE HAWKWOOD SITE M-17-00A LATE 1991 M-17-00B OCTOBER 1993</p>	<p>M-17-00A COMPLETE LIQUID EFFLUENT TREATMENT FACILITIES/ARRANGES FOR ALL PHASE 1 STREAMS</p> <p>M-17-00B COMPLETE LIQUID EFFLUENT TREATMENT FACILITIES/ARRANGES FOR ALL PHASE 1 STREAMS</p>	<p>M-17-00 COMPLETE LIQUID EFFLUENT TREATMENT FACILITIES/ARRANGES FOR ALL PHASE 1 STREAMS AND BAYPARK FOR ALL PHASE LIQUID EFFLUENT STREAMS AT THE HAWKWOOD SITE M-17-00A LATE 1991 M-17-00B OCTOBER 1993</p>
<p>M-17-01 COMPLETE B-POND BY-PASS SYSTEM INSTALLATION M-09A</p>	<p>COMPLETED AUGUST 1990</p>	<p>M-17-01 COMPLETE B-POND BY-PASS SYSTEM INSTALLATION M-09A</p>	<p>COMPLETED AUGUST 1990</p>
<p>M-17-02 COMPLETE PHASE 3 AERODIAL SOLUBLE DISTILLATE TREATMENT SYSTEM</p>	<p>DELETED SEE M-17-14, M-17-20 AND M-17-28</p>	<p>M-17-02 COMPLETE PHASE 3 AERODIAL SOLUBLE DISTILLATE TREATMENT SYSTEM</p>	<p>DELETED SEE M-17-14, M-17-20 AND M-17-28</p>
<p>M-17-03 COMPLETE PHASE 2 DEHYDRALIZER REGENERATION/NEUTRALIZATION SYSTEM UPGRADES</p>	<p>COMPLETED SEPTEMBER 1989</p>	<p>M-17-03 COMPLETE PHASE 2 DEHYDRALIZER REGENERATION/NEUTRALIZATION SYSTEM UPGRADES</p>	<p>COMPLETED SEPTEMBER 1989</p>
<p>B PLANT CHEMICAL SEWER</p>	<p>M-17-04 CEASE DISCHARGE OF THE B PLANT CHEMICAL SEWER TO THE 216-B-3 POND SYSTEM</p>	<p>M-17-04 CEASE DISCHARGE OF THE B PLANT CHEMICAL SEWER TO THE 216-B-3 POND SYSTEM</p>	<p>M-17-04 CEASE DISCHARGE OF THE B PLANT CHEMICAL SEWER TO THE 216-B-3 POND SYSTEM</p>
<p>M-17-05 SELECT 300 AREA PROCESS THE LIQUID EFFLUENT TREATMENT OPTION AND ESTABLISH SCHEDULE FOR IMPLEMENTING TREATMENT AND CEASING LAND DISCHARGES</p>	<p>COMPLETED MARCH 1990</p>	<p>M-17-05 SELECT 300 AREA PROCESS THE LIQUID EFFLUENT TREATMENT OPTION AND ESTABLISH SCHEDULE FOR IMPLEMENTING TREATMENT AND CEASING LAND DISCHARGES</p>	<p>COMPLETED MARCH 1990</p>
<p>300 AREA PROCESS TRENCHES</p>	<p>M-17-06 CEASE ALL DISCHARGES TO 300 AREA PROCESS TRENCHES BY 12PM M-17-06A THROUGH M-17-06A 300 AREA PROCESS TRENCH MANAGEMENT</p>	<p>M-17-06 CEASE ALL DISCHARGES TO 300 AREA PROCESS TRENCHES BY 12PM M-17-06A THROUGH M-17-06A 300 AREA PROCESS TRENCH MANAGEMENT</p>	<p>M-17-06 CEASE ALL DISCHARGES TO 300 AREA PROCESS TRENCHES BY 12PM M-17-06A THROUGH M-17-06A 300 AREA PROCESS TRENCH MANAGEMENT</p>

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# FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

## ACTION PLAN WORK SCHEDULE

WASTE TREATMENT M-17-01 M-17-02 M-17-03 M-17-04 M-17-05 M-17-06 M-17-07 M-17-08 M-17-09 M-17-10 M-17-11 M-17-12 M-17-13 M-17-14 M-17-15 M-17-16 M-17-17 M-17-18 M-17-19 M-17-20 M-17-21 M-17-22 M-17-23 M-17-24 M-17-25 M-17-26 M-17-27 M-17-28 M-17-29 M-17-30 M-17-31 M-17-32 M-17-33 M-17-34 M-17-35 M-17-36 M-17-37 M-17-38 M-17-39 M-17-40 M-17-41 M-17-42 M-17-43 M-17-44 M-17-45 M-17-46 M-17-47 M-17-48 M-17-49 M-17-50 M-17-51 M-17-52 M-17-53 M-17-54 M-17-55 M-17-56 M-17-57 M-17-58 M-17-59 M-17-60 M-17-61 M-17-62 M-17-63 M-17-64 M-17-65 M-17-66 M-17-67 M-17-68 M-17-69 M-17-70 M-17-71 M-17-72 M-17-73 M-17-74 M-17-75 M-17-76 M-17-77 M-17-78 M-17-79 M-17-80 M-17-81 M-17-82 M-17-83 M-17-84 M-17-85 M-17-86 M-17-87 M-17-88 M-17-89 M-17-90 M-17-91 M-17-92 M-17-93 M-17-94 M-17-95 M-17-96 M-17-97 M-17-98 M-17-99 M-17-100	WASTE TREATMENT M-17-01 M-17-02 M-17-03 M-17-04 M-17-05 M-17-06 M-17-07 M-17-08 M-17-09 M-17-10 M-17-11 M-17-12 M-17-13 M-17-14 M-17-15 M-17-16 M-17-17 M-17-18 M-17-19 M-17-20 M-17-21 M-17-22 M-17-23 M-17-24 M-17-25 M-17-26 M-17-27 M-17-28 M-17-29 M-17-30 M-17-31 M-17-32 M-17-33 M-17-34 M-17-35 M-17-36 M-17-37 M-17-38 M-17-39 M-17-40 M-17-41 M-17-42 M-17-43 M-17-44 M-17-45 M-17-46 M-17-47 M-17-48 M-17-49 M-17-50 M-17-51 M-17-52 M-17-53 M-17-54 M-17-55 M-17-56 M-17-57 M-17-58 M-17-59 M-17-60 M-17-61 M-17-62 M-17-63 M-17-64 M-17-65 M-17-66 M-17-67 M-17-68 M-17-69 M-17-70 M-17-71 M-17-72 M-17-73 M-17-74 M-17-75 M-17-76 M-17-77 M-17-78 M-17-79 M-17-80 M-17-81 M-17-82 M-17-83 M-17-84 M-17-85 M-17-86 M-17-87 M-17-88 M-17-89 M-17-90 M-17-91 M-17-92 M-17-93 M-17-94 M-17-95 M-17-96 M-17-97 M-17-98 M-17-99 M-17-100	CY 1984												CY 1985												1986	1987	1988	1989	1990	2000
		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	1 QTR	2 QTR	3 QTR	4 QTR														
200 AREA TREATED EFFLUENT DISPOSAL	INITIATE FULL-SCALE HOT OPERATIONS OF THE 200 AREA TREATED EFFLUENT DISPOSAL FACILITY PROJECT W-0491 WITH PERMITTED DISPOSAL OF THE EFFLUENT TO ENTER THE SOIL COLUMN OR SURFACE WATER																														
300 AREA TREATED EFFLUENT DISPOSAL	INITIATE FULL-SCALE HOT OPERATIONS OF THE 300 AREA TREATED EFFLUENT DISPOSAL FACILITY PROJECT L-0494 WITH PERMITTED DISPOSAL OF THE EFFLUENT TO SURFACE WATER																														
242-A EVAPORATOR PUREX	INITIATE FULL-SCALE HOT OPERATIONS OF THE 242-A EVAPORATOR PUREX PLANT PROCESS CONDENSATE TREATMENT FACILITY WITH PERMITTED DISPOSAL OF TREATED EFFLUENT TO THE SOIL COLUMN																														

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# FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

## ACTION PLAN WORK SCHEDULE

MAJOR INTERIM	MILESTONE LEGEND	CY 1994												CY 1995				1996	1997	1998	1999	2000
		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	1 QTR	2 QTR	3 QTR	4 QTR					
N-RE-ACTOR EFFLUENT	CEASE DISCHARGE TO THE 1325-H LIQUID WASTE DISPOSAL FACILITY (WDS) SYSTEM																					
PPF WASTEWATER	CEASE ALL DISCHARGE TO THE 206-U-17 CRIB																					
UO3JU PLANT WASTEWATER	CEASE DISCHARGE OF UO3JU PLANT WASTEWATER TO THE 206-U-17 CRIB																					
242-S EVAPORATOR STEAM CONDENSATE	CEASE DISCHARGE OF 242-S EVAPORATOR STEAM CONDENSATE TO THE 206-U-17 CRIB																					
UO3 PLANT PROCESS CONDENSATE	CEASE DISCHARGE TO THE 206-U-17 CRIB																					
PUREX PLANT PROCESS CONDENSATE	IMPLEMENT PUREX PLANT PROCESS CONDENSATE BATHKART																					
PUREX PLANT AMMONIA SCRUBBER CONDENSATE	IMPLEMENT PUREX PLANT AMMONIA SCRUBBER CONDENSATE BATHKART																					

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# FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

## ACTION PLAN WORK SCHEDULE

MILESTONE (ECLAD)		CY 1994												CY 1995				1996	1997	1998	1999	2000		
MAJOR MILESTONE	PROJECT DATE	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	1 QTR	2 QTR	3 QTR	4 QTR							
PUREX PLANT STEAM CONDENSATE																								
M-11-22 CEASE DISCHARGE OF THE PUREX PLANT STEAM CONDENSATE TO THE 26-B-3 POND SYSTEM																								
PUREX PLANT COOLING WATER																								
M-11-23 CEASE DISCHARGE OF THE PUREX PLANT COOLING WATER TO THE 26-B-3 POND SYSTEM																								
PUREX PLANT CHEMICAL SEWERN																								
M-11-24 CEASE DISCHARGE OF THE PUREX PLANT CHEMICAL SEWERN TO THE 26-B-3 POND SYSTEM																								
B PLANT STEAM CONDENSATE																								
M-11-25 CEASE ALL DISCHARGE TO THE 26-B-55 CTRB																								
B PLANT PROCESS CONDENSATE																								
M-11-26 CEASE ALL DISCHARGE TO THE 26-B-62 CTRB																								
B PLANT COOLING WATER																								
M-11-27 SUBMIT SAMPLING AND ANALYSIS PLAN FOR B PLANT COOLING WATER																								
AVIAZ TANK FARM STEAM CONDENSATE																								
M-11-28 CEASE ALL DISCHARGE TO THE 26-A-08 CTRB																								
COMPLETED SEPTEMBER 1991																								
COMPLETED SEPTEMBER 1991																								
COMPLETED APRIL 1992																								
COMPLETED SEPTEMBER 1991																								
M-11-24 CEASE DISCHARGE OF THE PUREX PLANT CHEMICAL SEWERN TO THE 26-B-3 POND SYSTEM																								
M-11-23 CEASE DISCHARGE OF THE PUREX PLANT COOLING WATER TO THE 26-B-3 POND SYSTEM																								

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# FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

## ACTION PLAN WORK SCHEDULE

MILESTONE LEGEND MAJOR <input checked="" type="radio"/> TARGET DATE <input checked="" type="radio"/> MINOR <input checked="" type="radio"/> INTERMEDIATE <input type="radio"/>	CY 1994												CY 1995								
	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	1 QTR	2 QTR	3 QTR	4 QTR	1996	1997	1998	1999	2000
242-A EVAPORATOR PROCESS CONDENSATE M-17-29 IMPLEMENT 242-A EVAPORATOR PROCESS CONDENSATE BATH/ARI																					
242-A EVAPORATOR COOLING WATER M-17-30 SUBMIT SAMPLING AND ANALYSIS PLAN FOR 242-A EVAPORATOR COOLING WATER																					
242-A EVAPORATOR STEAM CONDENSATE M-17-31 SUBMIT SAMPLING AND ANALYSIS PLAN FOR 242-A EVAPORATOR STEAM CONDENSATE																					
241-A TANK FARM COOLING WATER M-17-32 COMPLETE TANK FARM VENTILATION UPGRADE PROJECT W-0-20																					
244-AIR VAULT COOLING WATER M-17-33 SUBMIT SAMPLING AND ANALYSIS PLAN FOR 244-AIR VAULT COOLING WATER																					
2724-W LAUNDRY WASTEWATER M-17-34 CEASE ALL DISCHARGES TO THE 216-W-LWC CRB																					

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# FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

## ACTION PLAN WORK SCHEDULE

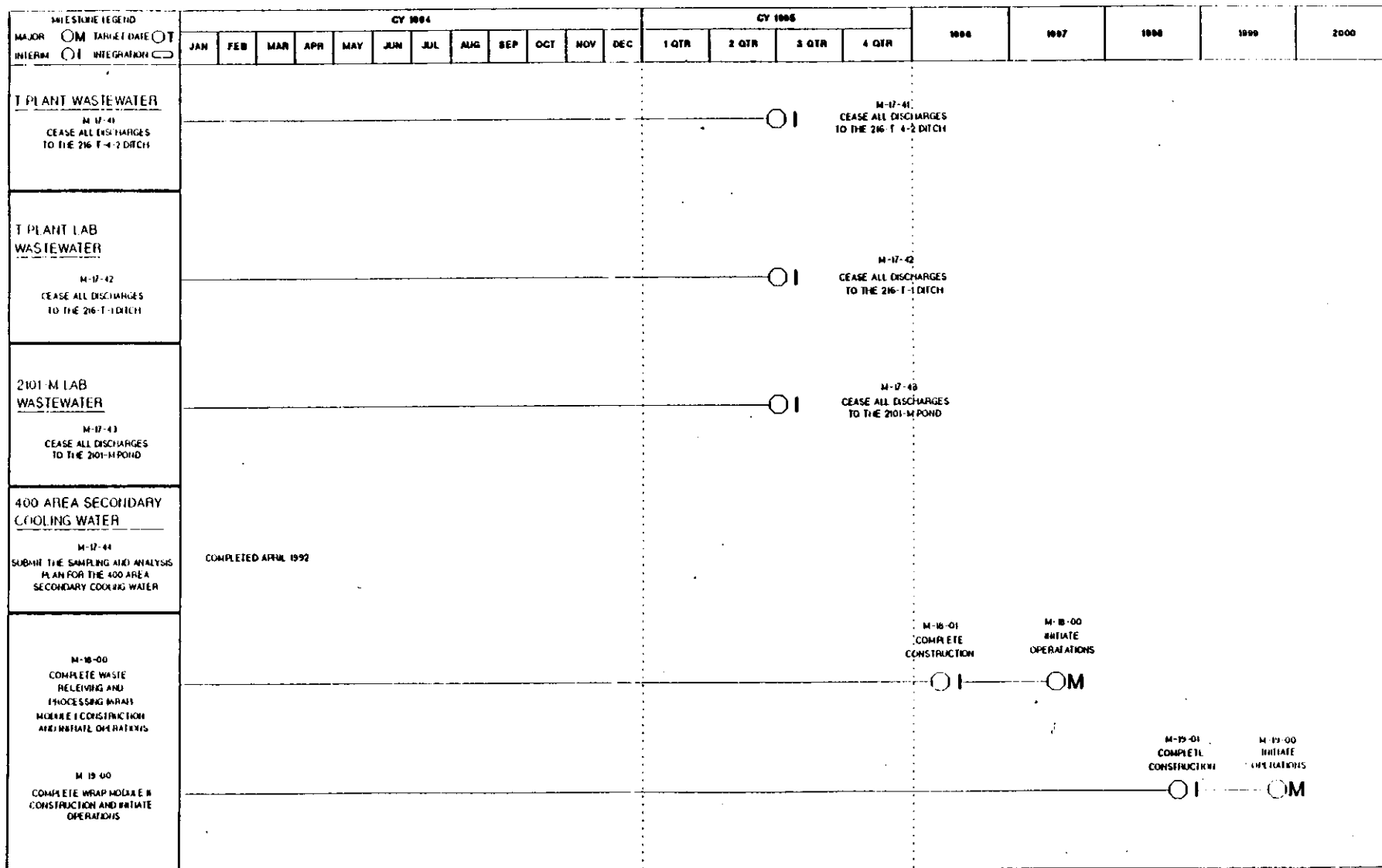
Milestone Record Milestone Milestone Date Milestone Description	CY 1994												CY 1995				1996	1997	1998	1999	2000																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																						
	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	1 QTR	2 QTR	3 QTR	4 QTR																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
DECONTAMINATION LAUNDRY FACILITY M-17-35 CEASE ISSUANCE OF THE DECONTAMINATION FACILITY LIQUID EFFLUENT TO THE 2M-B-3 POND SYSTEM RELEASED																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											



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## FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

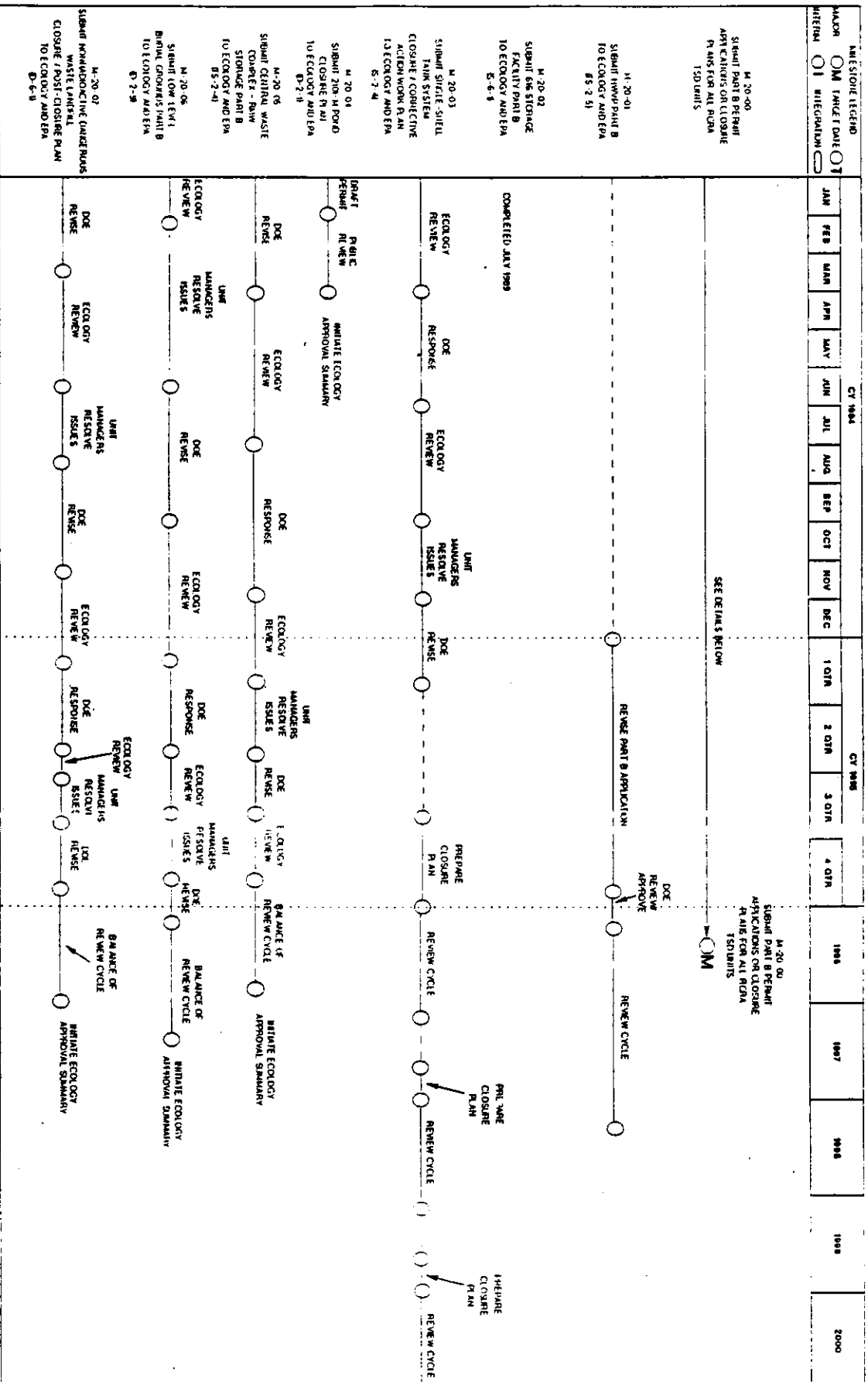
## ACTION PLAN WORK SCHEDULE



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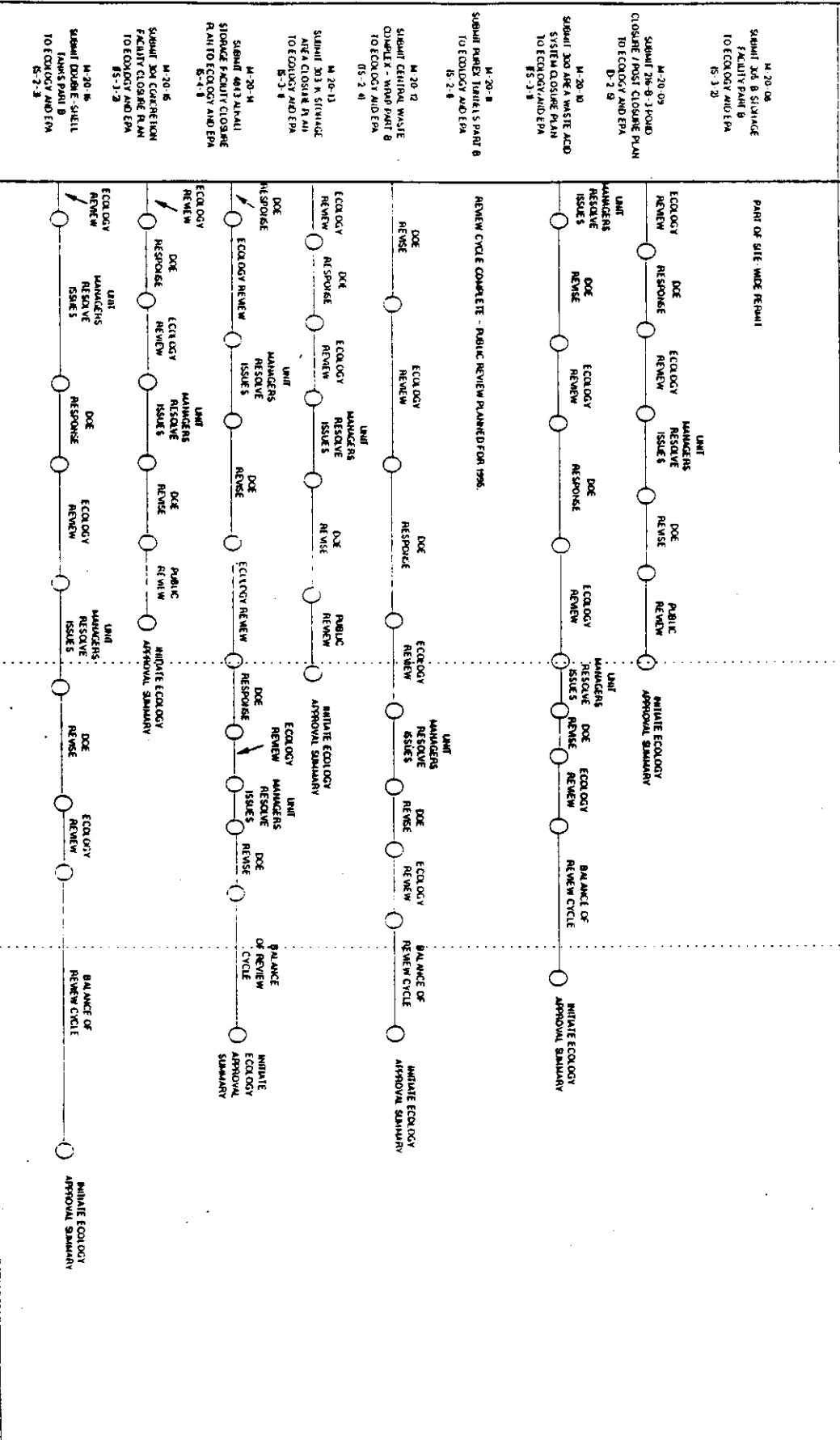
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## Page 14 of 40



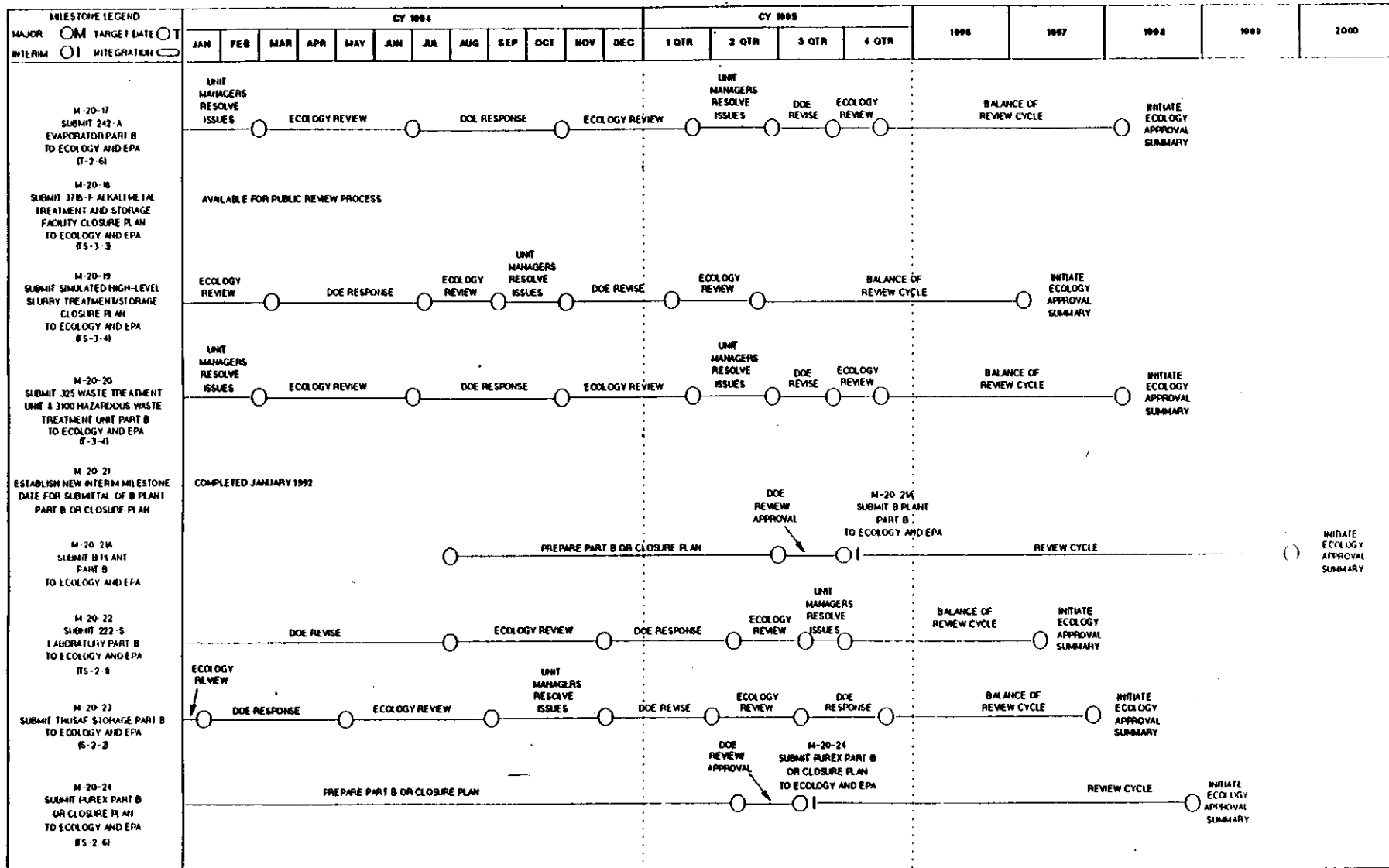
TPA PK QAI

WRESTLE TECH					
MASSON	<input checked="" type="radio"/> TRACK DATE	<input type="radio"/> T			
SIEGHEIM	<input type="radio"/> RELOCATION	<input type="checkbox"/>			
JAN	FEB	MAR	APR	MAY	JUN
JUL	AUG	SEP	OCT	NOV	DEC
CY 1984					
1 QTR	2 QTR	3 QTR	4 QTR		
				1986	1987
				1988	1989
				1990	2000



## FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

## ACTION PLAN WORK SCHEDULE



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## Page 17 of 40

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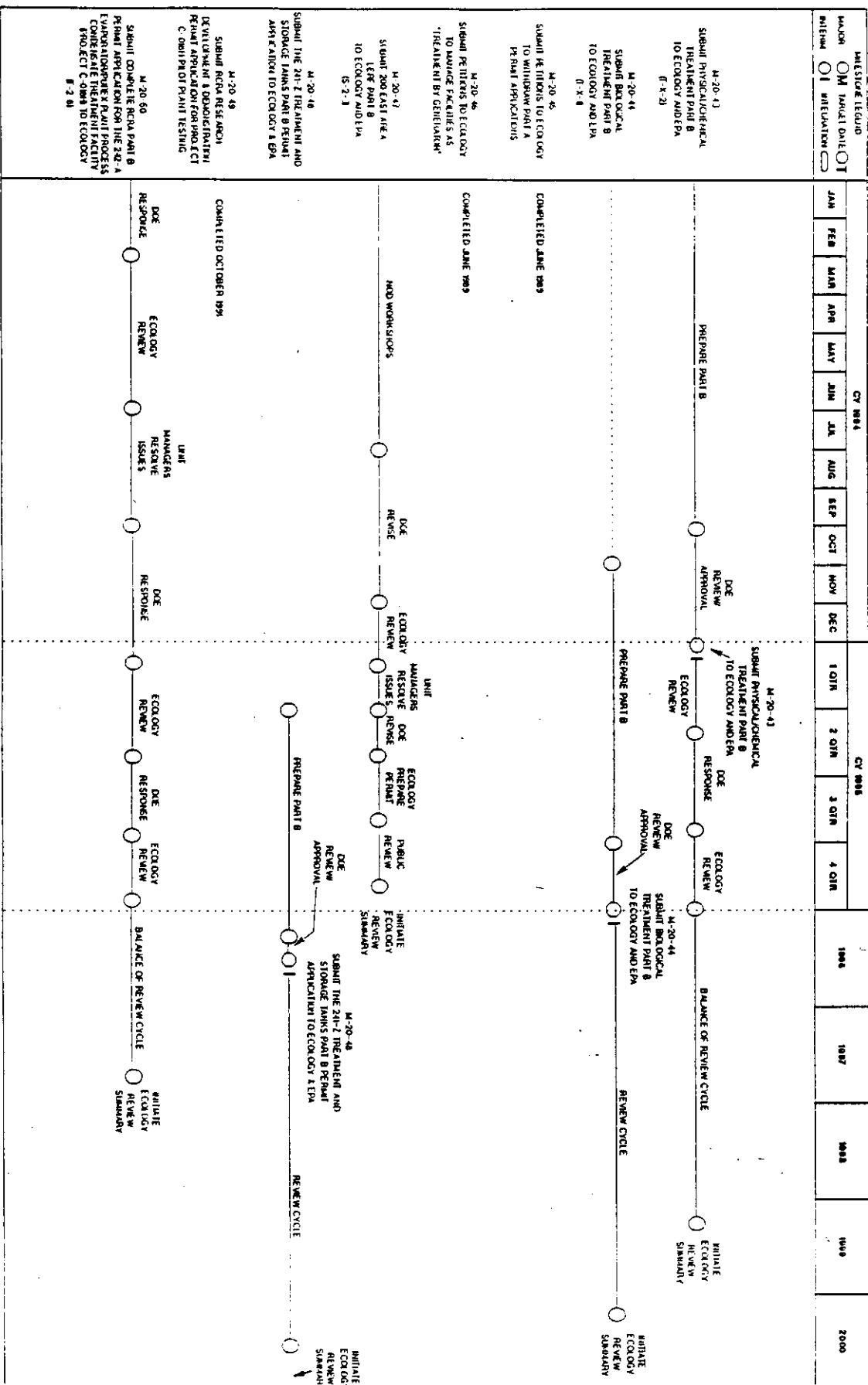
## Page 18 of 40



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# FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

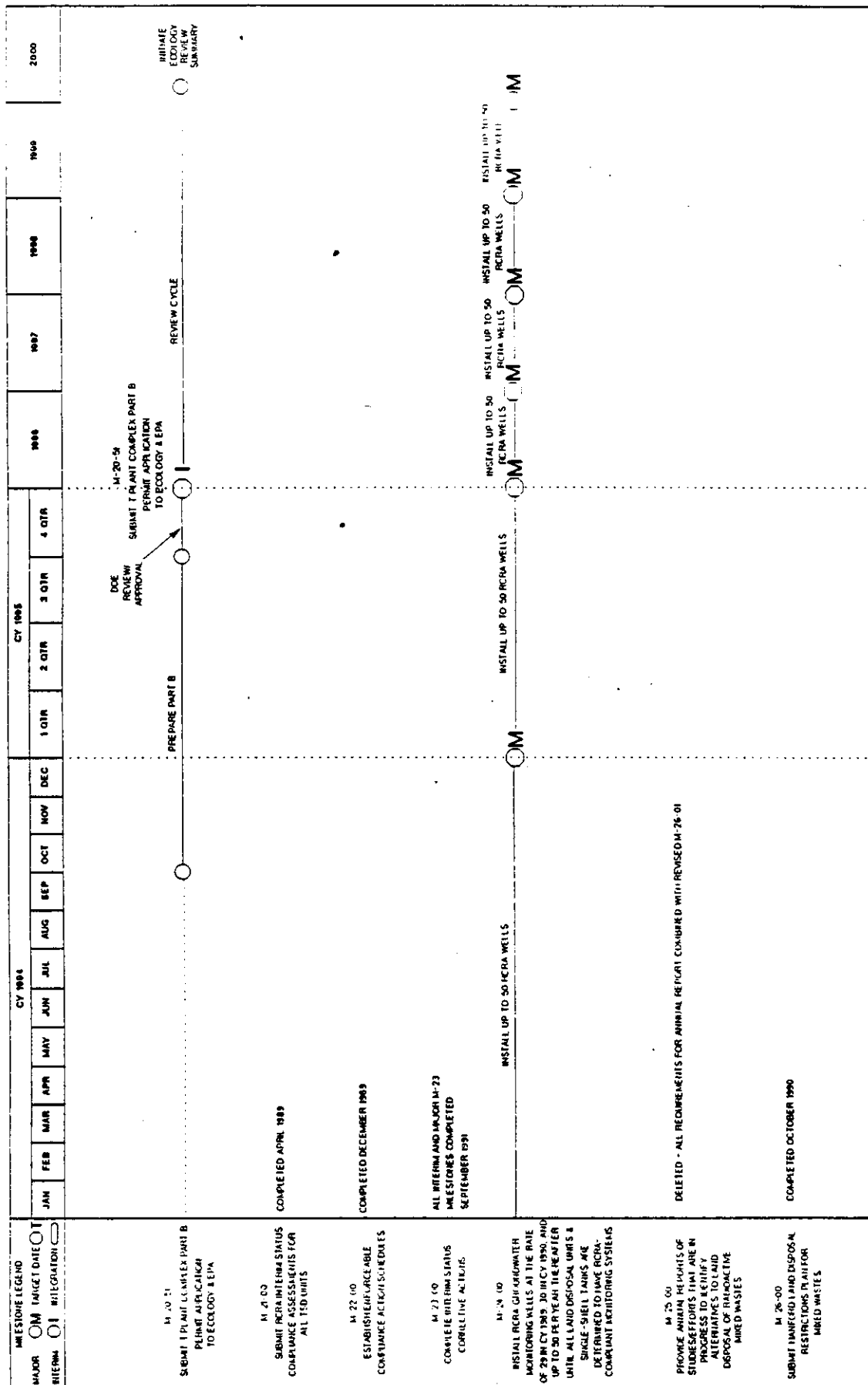
## ACTION PLAN WORK SCHEDULE



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# FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

## ACTION PLAN WORK SCHEDULE





## MALESTOIRE LEGENDAIRE

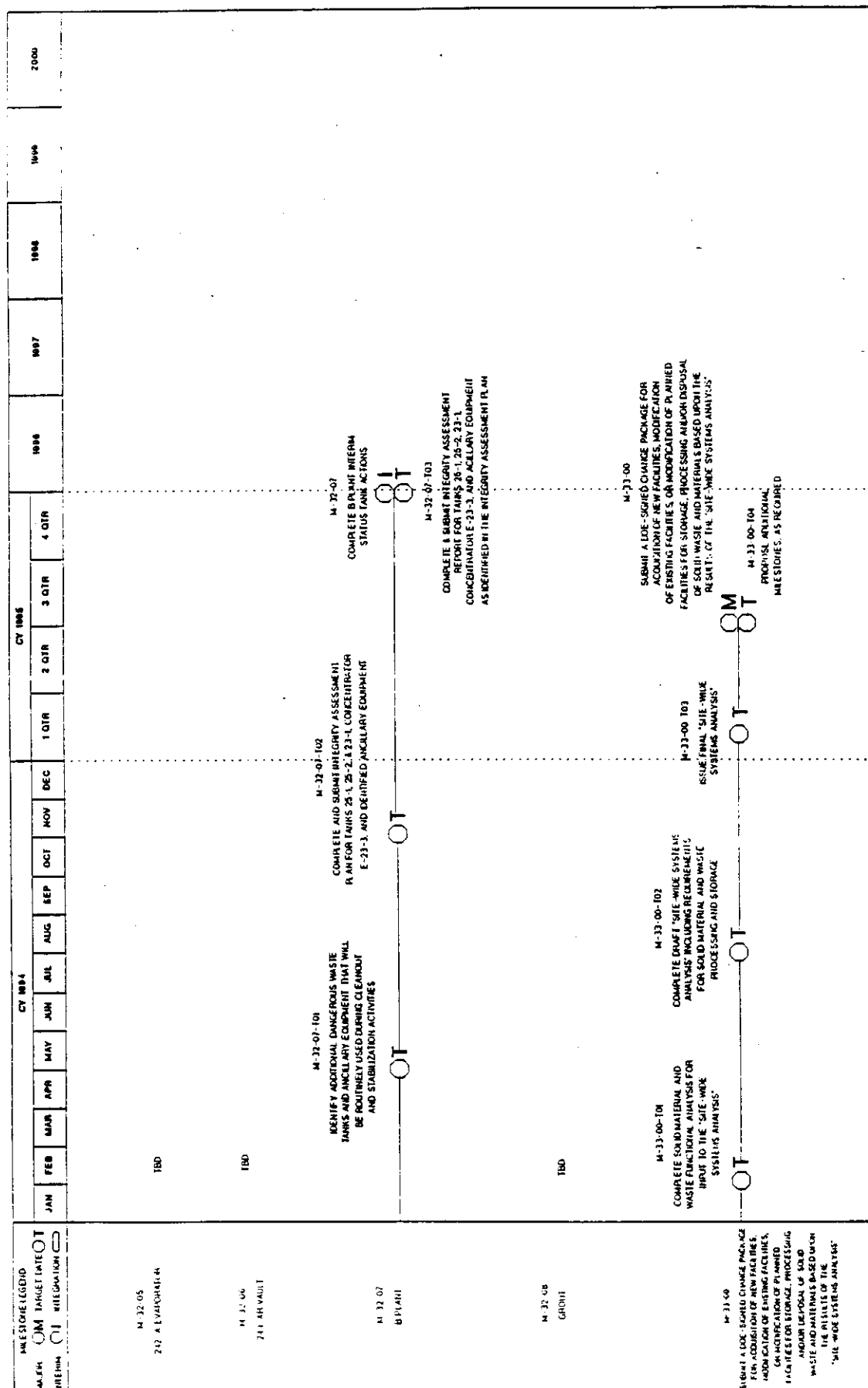
611-D

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MAILING: <input type="checkbox"/> YES <input type="checkbox"/> NO												
PHONE: <input type="text"/>												
FAX: <input type="text"/>												
E-MAIL: <input type="text"/>												
COMPANY: <input type="text"/>												
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## FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

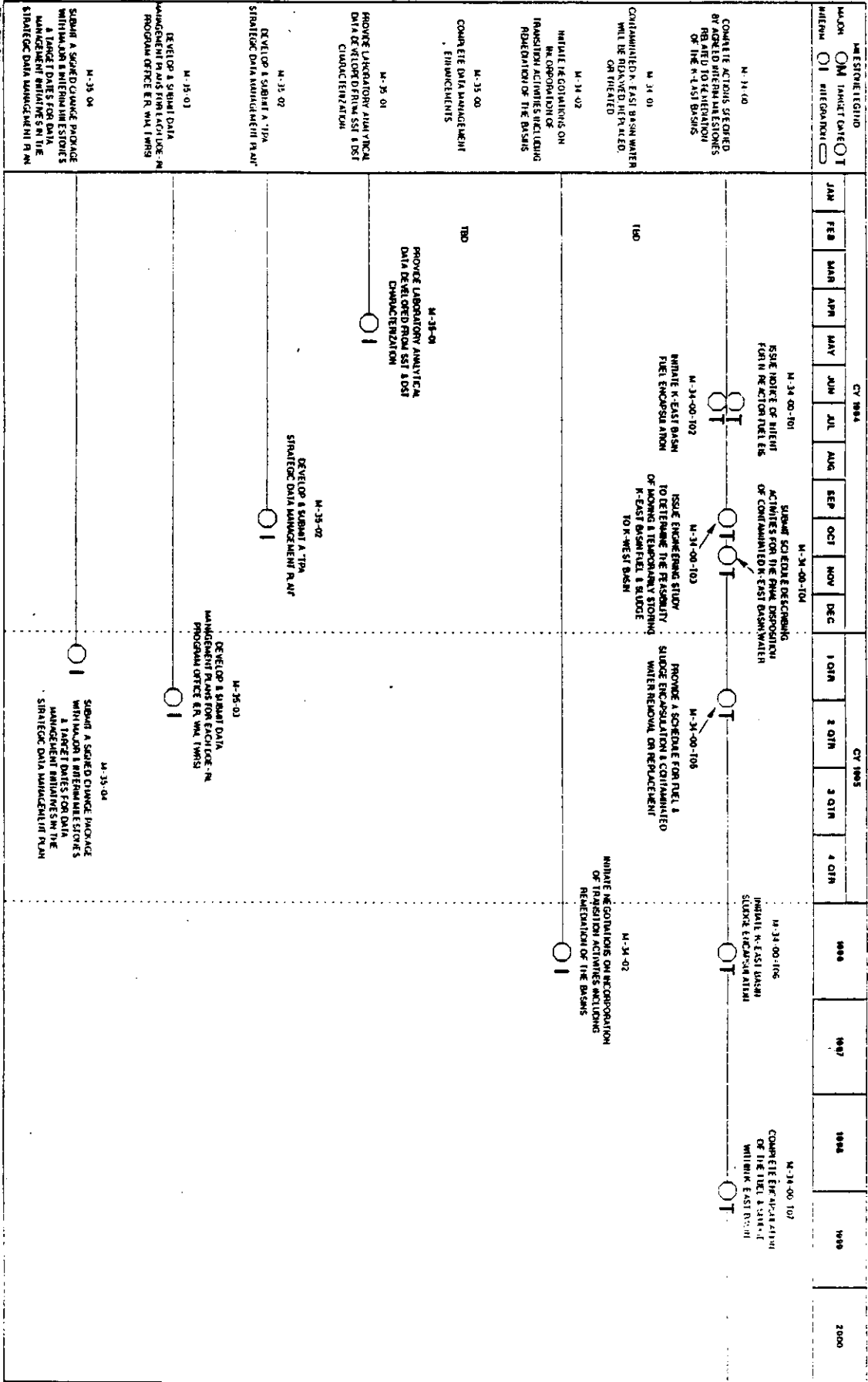
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# FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

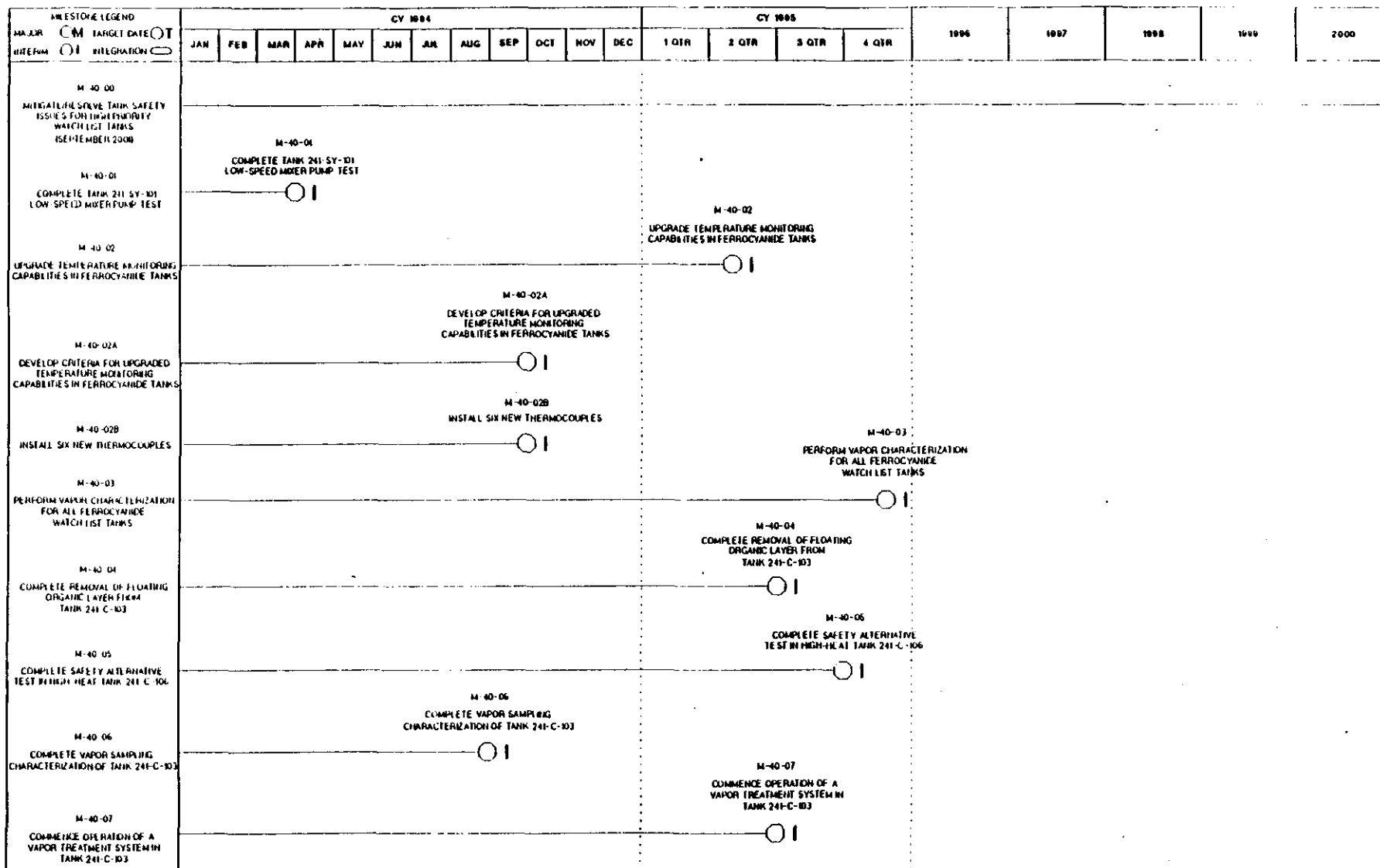
## ACTION PLAN WORK SCHEDULE



## FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

Page 25 of 40

## ACTION PLAN WORK SCHEDULE



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# FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

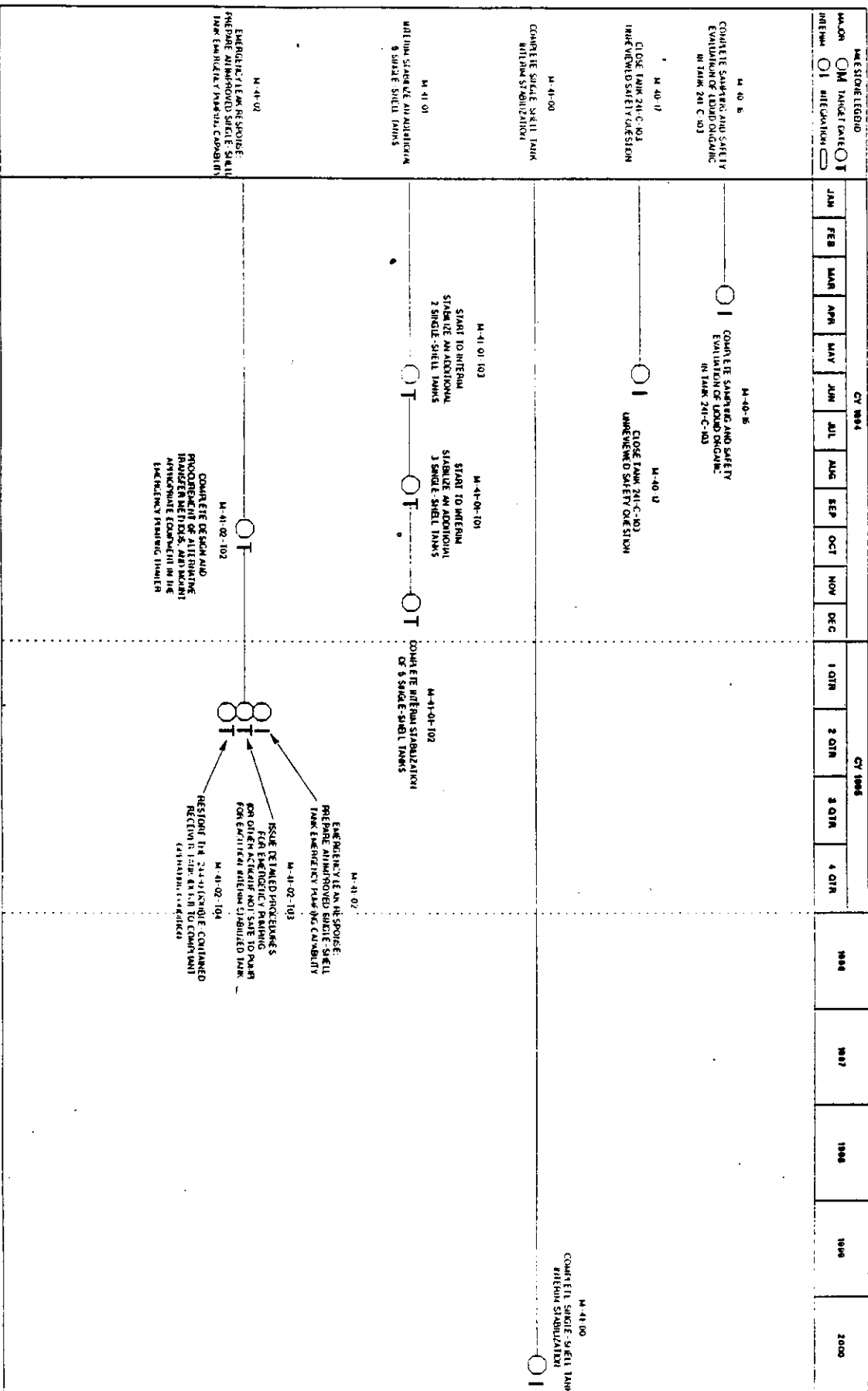
## ACTION PLAN WORK SCHEDULE

ACTION	C/M TARGET DATE/TIME	CY 1994												CY 1995				CY 1996				CY 1997				CY 1998				CY 1999				CY 2000																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																														
		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	1 QTR	2 QTR	3 QTR	4 QTR	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																															
PERFORM VAPOR CHARACTERIZATION FOR ALL CHROMIUM WASTE TANKS	M-40-08																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																															

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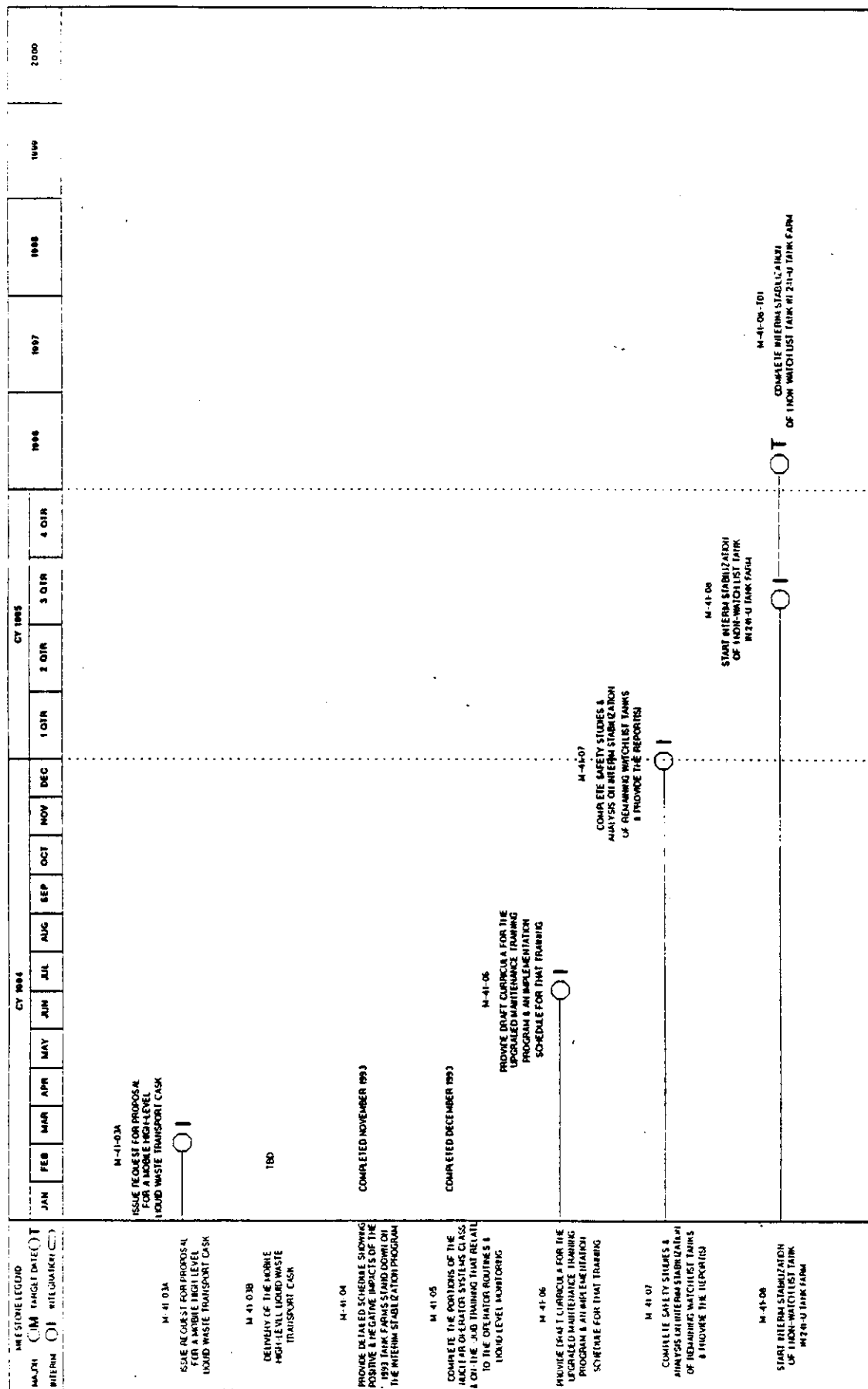
# FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

## ACTION PLAN WORK SCHEDULE



# FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

## ACTION PLAN WORK SCHEDULE





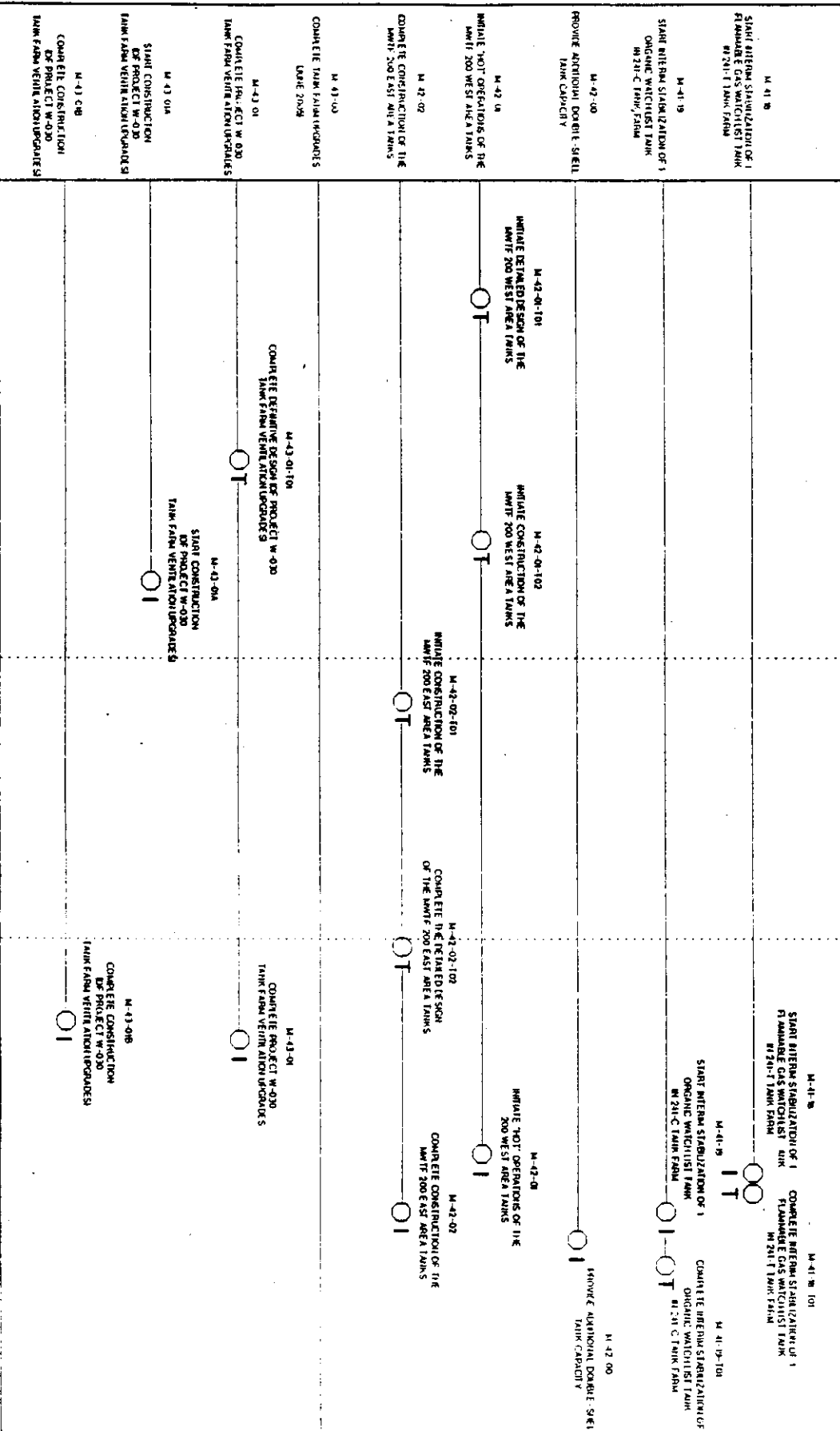
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# FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

## ACTION PLAN WORK SCHEDULE

Milestone/Event		CV 1994												CV 1995				1996	1997	1998	1999	2000			
JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	1 QTR	2 QTR	3 QTR	4 QTR										
START WITHIN STABILIZATION OF 7 NON-WATCHLIST TANKS M-24-1 TANK FARM														START INTERIM STABILIZATION OF 7 NON-WATCHLIST TANKS M-24-1 TANK FARM											
START WITHIN STABILIZATION OF 2 FLAMMABLE GAS WATCHLIST TANKS M-24-1 TANK FARM														START INTERIM STABILIZATION OF 2 FLAMMABLE GAS WATCHLIST TANKS M-24-1 TANK FARM											
START WITHIN STABILIZATION OF 4 FERROCYANIDE WATCHLIST TANKS M-24-1 TANK FARM														START INTERIM STABILIZATION OF 4 FERROCYANIDE WATCHLIST TANKS M-24-1 TANK FARM											
START WITHIN STABILIZATION OF 3 ORGANIC WATCHLIST TANKS M-24-1 TANK FARM														START INTERIM STABILIZATION OF 3 ORGANIC WATCHLIST TANKS M-24-1 TANK FARM											
START WITHIN STABILIZATION OF 7 FLAMMABLE GAS WATCHLIST TANKS M-24-1 TANK FARM														START INTERIM STABILIZATION OF 7 FLAMMABLE GAS WATCHLIST TANKS M-24-1 TANK FARM											
START WITHIN STABILIZATION OF 2 ORGANIC WATCHLIST TANKS M-24-1 TANK FARM														START INTERIM STABILIZATION OF 2 ORGANIC WATCHLIST TANKS M-24-1 TANK FARM											
START WITHIN STABILIZATION OF 2 NON-WATCHLIST TANKS M-24-1 TANK FARM														START INTERIM STABILIZATION OF 2 NON-WATCHLIST TANKS M-24-1 TANK FARM											
START WITHIN STABILIZATION OF 1 FERROCYANIDE WATCHLIST TANK M-24-1 TANK FARM														START INTERIM STABILIZATION OF 1 FERROCYANIDE WATCHLIST TANK M-24-1 TANK FARM											

MAE STORE RECORD		CY 1984												CY 1985								
MAJOR INVENTORY	DATE BILGASINORI	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	1 QTR	2 QTR	3 QTR	4 QTR	1986	1987	1988	1989	2000

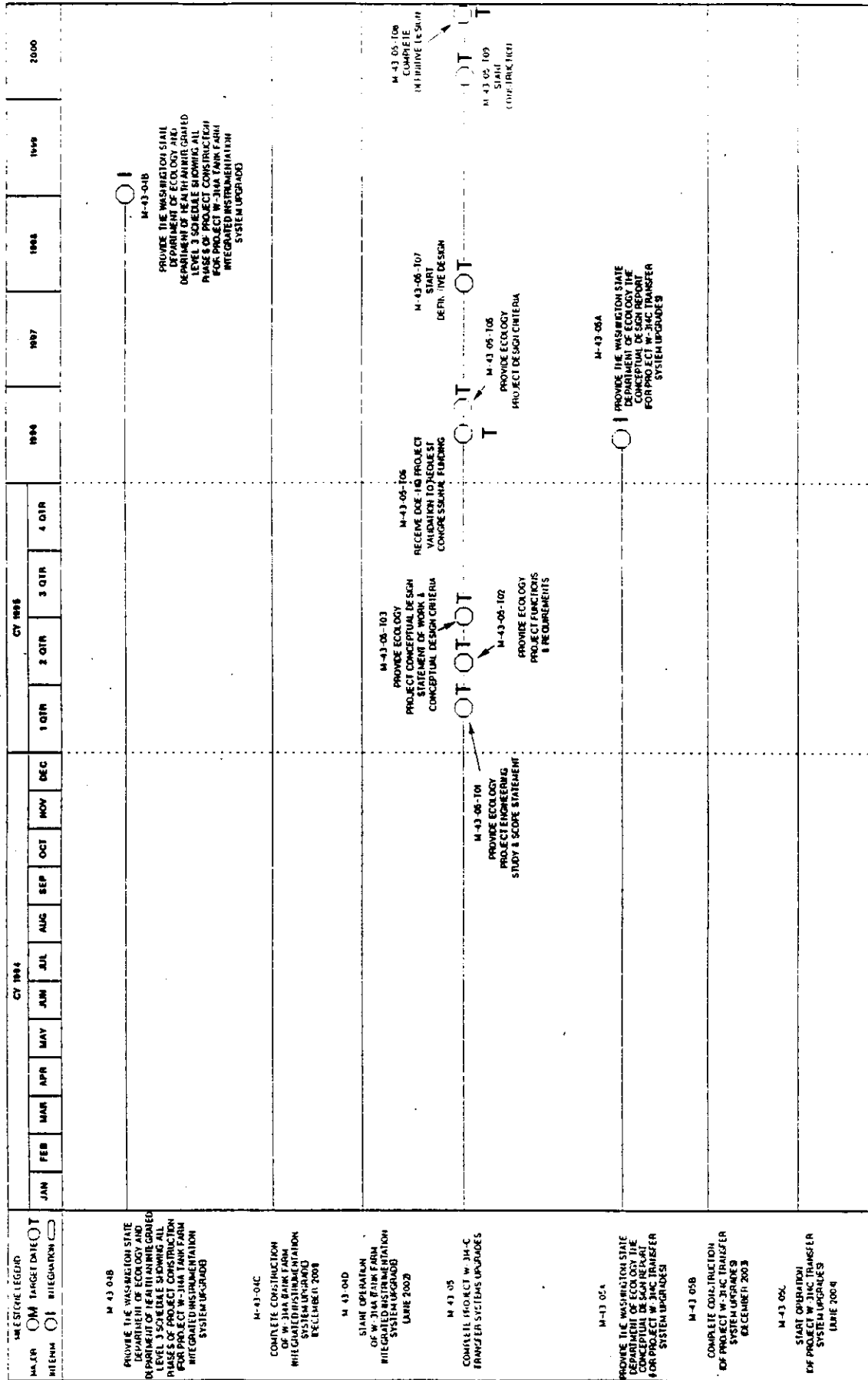


## Page 31 of 40

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# FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

## ACTION PLAN WORK SCHEDULE



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# FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

## ACTION PLAN WORK SCHEDULE

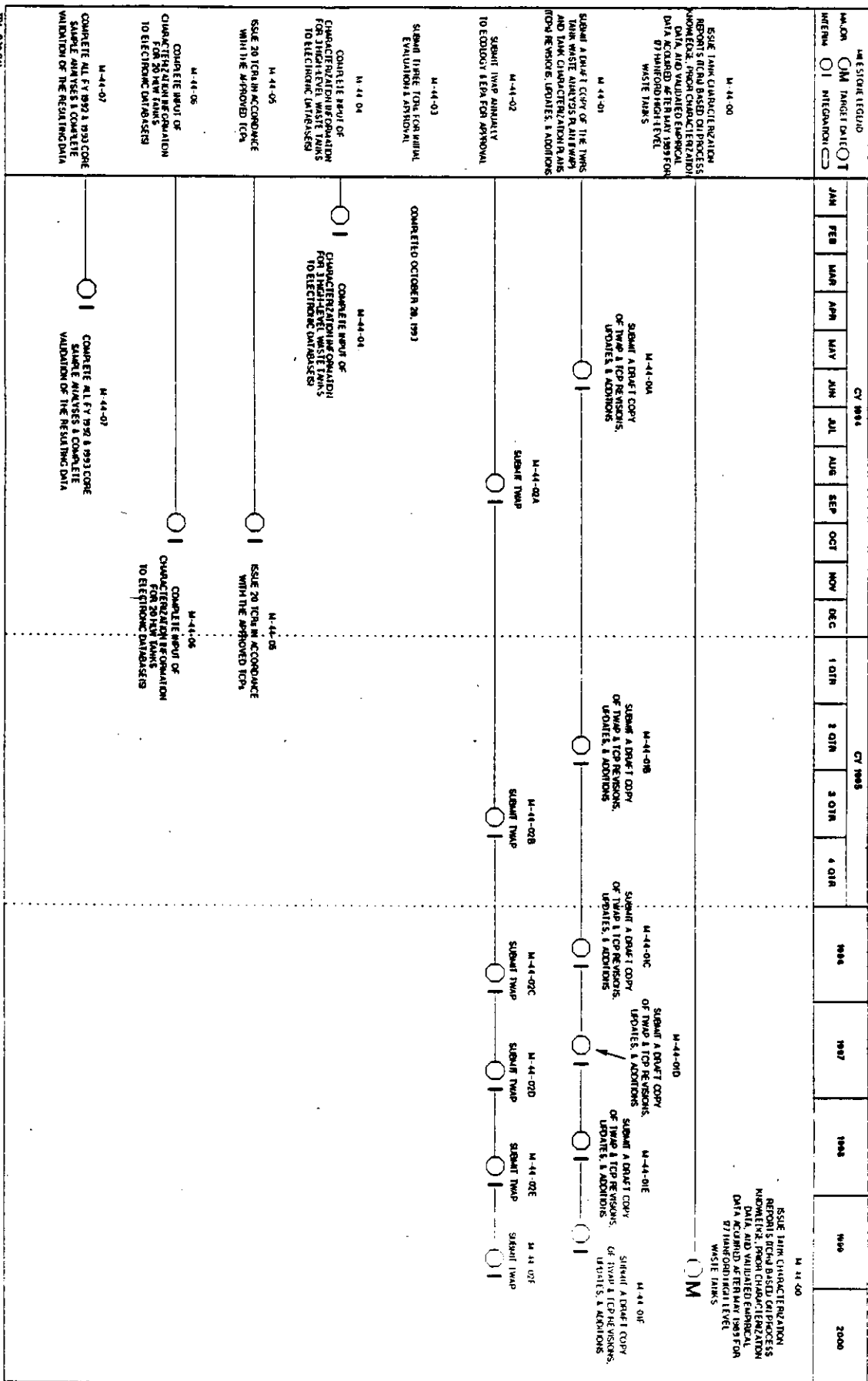
MILESTONE LEGEND MACH OI TARGET DATE INTERM OI INTEGRATION	CY 1984												CY 1985				1986	1987	1988	1989	2000
	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	1 QTR	2 QTR	3 QTR	4 QTR					
M-43-06 COMPLETE PROJECT W 3100 TANK FARM ELECTRICAL UPGRADE																					
M-43-06A PROVIDE THE WASHINGTON STATE DEPARTMENT OF ENERGY THE PROJECT CONCEPTUAL DESIGN REPORT FOR PROJECT W 3100 TANK FARM ELECTRICAL UPGRADE																					
M-43-06B COMPLETE CONSTRUCTION OF PROJECT W 3100 TANK FARM ELECTRICAL UPGRADE BY DECEMBER 2004																					
M-43-07 START OPERATION OF PROJECT W 3100 TANK FARM ELECTRICAL UPGRADE LATE 2009																					
M-43-07 COMPLETE PROJECT W 008 REPLACEMENT OF CROSS SITE TRANSFER SYSTEM																					
M-43-07A START CONSTRUCTION OF PROJECT W 008 REPLACEMENT OF CROSS SITE TRANSFER SYSTEM																					
M-43-07B COMPLETE CONSTRUCTION OF PROJECT W 008 REPLACEMENT OF CROSS SITE TRANSFER SYSTEM																					
M-43-07C CROSS-SITE TRANSFER SYSTEM OPERATIONAL																					

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# FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

## ACTION PLAN WORK SCHEDULE



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# FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

## ACTION PLAN WORK SCHEDULE

ACTION PLAN LEGEND	CY 1994												CY 1995				1996	1997	1998	1999	2000
	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	1 QTR	2 QTR	3 QTR	4 QTR					
<p>ISSUE 30 ICR IN ACCORDANCE WITH THE APPROVED ICR. COMPLETE INPUT OF CHARACTERIZATION INFORMATION FOR 30 NEW TANKS TO ELECTRONIC DATABASES</p> <p>M-44-08</p>																					
<p>ISSUE 40 ICR IN ACCORDANCE WITH THE APPROVED ICR. COMPLETE INPUT OF CHARACTERIZATION INFORMATION FOR 40 NEW TANKS TO ELECTRONIC DATABASES</p> <p>M-44-09</p>																					
<p>ISSUE 50 ICR IN ACCORDANCE WITH THE APPROVED ICR. COMPLETE INPUT OF CHARACTERIZATION INFORMATION FOR 50 NEW TANKS TO ELECTRONIC DATABASES</p> <p>M-44-10</p>																					
<p>ISSUE 60 ICR IN ACCORDANCE WITH THE APPROVED ICR. COMPLETE INPUT OF CHARACTERIZATION INFORMATION FOR 60 NEW TANKS TO ELECTRONIC DATABASES</p> <p>M-44-11</p>																					
<p>ISSUE 70 ICR IN ACCORDANCE WITH THE APPROVED ICR. COMPLETE INPUT OF CHARACTERIZATION INFORMATION FOR 70 NEW TANKS TO ELECTRONIC DATABASES</p> <p>M-44-12</p>																					

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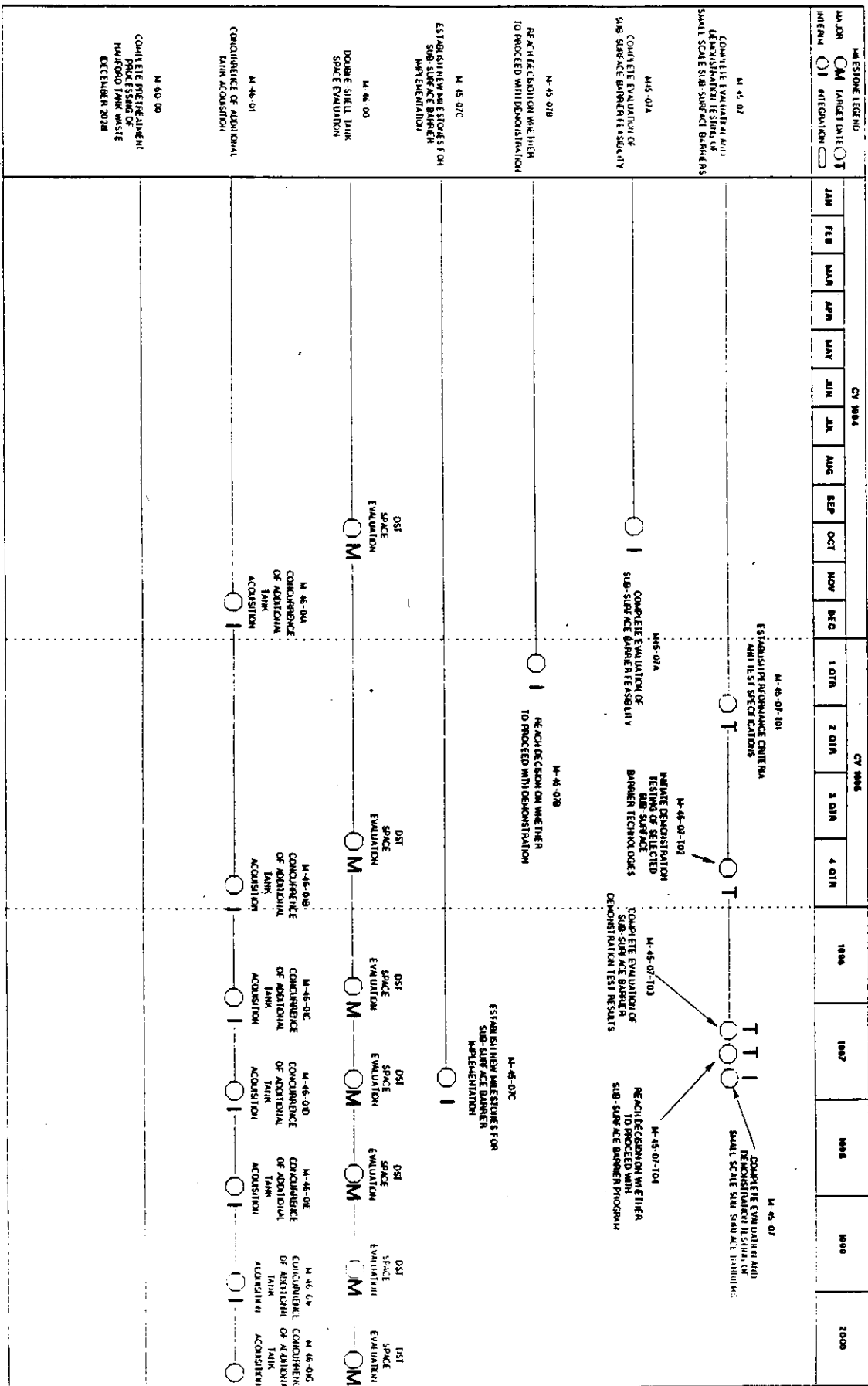
FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

ACTION PLAN WORK SCHEDULE

MILESTONE LEGEND M-45 CM PROJECT DATE INITIALS 01 MITIGATION	CY 1994												CY 1995				1996	1997	1998	1999	2000
	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	1 QTR	2 QTR	3 QTR	4 QTR					
M-45-00 COMPLETE CLOSURE OF ALL SPACE-SHELL TANK FARM SEPTEMBER 2024																					
M-45-01 DEVELOP SINGLE-SHELL TANK SSM RETRIEVAL TECHNOLOGY																					
M-45-02 SUBMIT INITIAL TREATIES TO SST RETRIEVAL SECURITE DOCUMENT FOR ECOLOGY APPROVAL																					
M-45-03A INITIATE SLUICKING RETRIEVAL OF C-106																					
M-45-04A COMPLETE CONCEPTUAL DESIGN FOR THE INITIAL SST RETRIEVAL SYSTEMS																					
M-45-05 RETRIEVE WASTE FROM ALL REMAINING SINGLE-SHELL TANKS SEPTEMBER 2018																					
M-45-06 COMPLETE CLOSURE OF ALL SPACE-SHELL TANK FARM SEPTEMBER 2024																					



MISSION LEGEND		CY 1984						CY 1985													
MAJOR	<input checked="" type="radio"/> TARGET DATE	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	1 QTR	2 QTR	3 QTR	4 QTR				
INTERIM	<input type="radio"/> INTERPOLATION																				
																		1984	1987	1990	2000



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# FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

## ACTION PLAN WORK SCHEDULE

MILESTONE LEGEND	ACTION	TARGET DATE	CY 1994												CY 1995				1996	1997	1998	1999	2000																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																	
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M 60-01	START CONSTRUCTION OF LTP PRETREATMENT FACILITY																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																							

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# FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

## ACTION PLAN WORK SCHEDULE

MILESTONE/DESCRIPTION ACTION PLAN/INITIALS DATE	CY 1984												CY 1985				1986	1987	1988	1989	2000
	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	1 QTR	2 QTR	3 QTR	4 QTR					
M-51-02 COMPLETE METER TESTS A SELECT METER																					
M-51-03 INITIALIZE NOT OPERATIONS OF THE NEW WITRIFICATION FACILITY FEBRUARY 2000																					
M-40-00 COMPLETE WITRIFICATION OF HARTFORD LOW-LEVEL TANK WASTE EVALUATION 2000																					
M-40-01 BE GULF METER TESTING WITH SHALAMITS																					
M-40-01A DEFINE AND SCALE THE SHALAMIT RECEIVE AND BASELINE WITH METER TESTS																					
M-40-02 COMPLETE METER FEASIBILITY A SELECT OPERABILITY TESTS ESTABLISH REFERENCE METERING A FORMAL ACTION WORKSHEETS COMPLETE SYSTEM REQUIREMENTS																					
M-40-03 SUBMIT CONCEPTUAL DESIGN AND INITIALIZE DEFINITIVE DESIGN FOR THE WITRIFICATION FACILITY																					

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# FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

## ACTION PLAN WORK SCHEDULE

MILESTONE (EDDO) ACTION ON TARGET DATE INTERVAL OF INTERVENTION	CY 1994												CY 1995				1996	1997	1998	1999	2000
	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	1 QTR	2 QTR	3 QTR	4 QTR					
M-60-04 INITIATE CONSTRUCTION OF THE LHM VENTILATION FACILITY																					
M-60-05 INITIATE MODIFICATIONS OF THE LHM VENTILATION FACILITY (DATE 2005)																					
M-70-00 THE EDOF WILL BE OPERATIONAL AVAILABLE TO RECEIVE REMEDIATION WASTE ON SEPTEMBER 1996																					
M-70-01 SUBMIT A SINGLE-DESIGN EDOF DRAFT CONCEPTUAL DESIGN REPORT FOR REGULATORY REVIEW & COMMENT																					
M-70-02 SUBMIT REGULATION NEEDS ANALYSIS FOR CMAQ DESIGNATION NO CFR 364 AND A CERCLA ROD FOR REGULATORY APPROVAL																					

D-138

**APPENDIX E**  
**KEY INDIVIDUALS**

	<b>U.S. Environmental Protection Agency Region 10</b>	<b>Washington State Department of Ecology</b>	<b>U.S. Department of Energy, Richland Operations</b>
<b>Hanford Project Manager</b>	<b>Doug Sherwood</b>	<b>Roger Stanley</b>	<b>Steve Wisness</b>
	<b>Environmental Protection Agency Region 10 712 Swift Blvd., Suite 5 Richland, WA 99352 (509) 376-9529</b>	<b>Washington Department of Ecology Nuclear Waste Program P.O. Box 47600 Olympia, WA 98504-7600 (206) 407-7108</b>	<b>U.S. Department of Energy Field Office Richland P.O. Box 550 Richland, WA 99352 (509) 376-6798</b>
<b>Community Relations Contact</b>	<b>Dennis Faulk</b>	<b>Mary Getchell</b>	<b>Jon Yerxa</b>
	<b>Environmental Protection Agency Region 10 712 Swift Blvd., Suite 5 Richland, WA 99352 (509) 376-8631</b>	<b>Washington Department of Ecology Nuclear Waste Program P.O. Box 47600 Olympia, WA 98504-7600 (206) 407-7122</b>	<b>U.S. Department of Energy Field Office Richland P.O. Box 550 Richland, WA 99352 (509) 376-9628</b>

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## APPENDIX F

## Supporting Technical Plans and Procedures

Document	Status
Strategy for Handling and Disposing of Purgewater at the Hanford Site, Washington	WHC-MR-0039 Approved by DOE, EPA Ecology on August 21, 1990
Data Quality Strategy for Hanford Site Characterization	"Proposed Data Quality Strategy for Hanford Site Characterization, " WHC-SD-EN-AP-023, issued Jan. 19, 1991
Environmental Investigation and Site Characterization Manual (contains specific procedures governing Site investigation activities)	CM-7-7 Issued, September 1988
Data Reporting Requirements for the Hanford Site	To be developed
Guidance on Preparation of Laboratory Quality Assurance Plans	Draft issued
Data Validation Guidelines for Contract Laboratory Program Organic Analyses	WHC-CM-5-3 issued August 31, 1990
Data Validation Guidelines for Contract Laboratory Program Inorganic Analyses	WHC-CM-5-3 issued August 31, 1990

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## APPENDIX G - DATA MANAGEMENT INITIATIVES

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September 20, 1993

### LOCATIONAL DATA COLLECTION STANDARDS

#### Purpose:

Establish standards to be followed by all organizations collecting locational information at the Hanford Site. This will ensure that during the collection of locational information that standards and guidelines will be followed to assure accuracy and usability of the information.

A set of minimum standards for information needs associated with all X, Y, and Z coordinate data (surveyed or GPS) will be defined. Some examples of the ancillary information to be carried include: accuracy; coordinate type; type of collection method used; data collector; and the intended use and application.

### DATABASE DOCUMENTATION AND LISTING OF EXISTING SYSTEMS UPDATE

#### Purpose:

Undertake a full inventory of existing data management systems, their location, information contained in them, and the source of their information. With the existing and growing databases on the Hanford Site, an effort to understand what computer/automated systems exist on site needs to occur. This task should be assigned to all contractors. Their respective management should assign and require this task to be fulfilled internally.

### DATA REFERENCE SEARCH INFORMATION SYSTEM

#### Purpose:

Create a system to provide information regarding site characterization historic documents, records, and photography that directly relate to TPA activities.

All resulting information gathered needs to be indexed, referenced, and automated. This will reduce redundant data collection of historic documents on closely associated operable units, and thus save valuable research time and costs.

## APPENDIX G - DATA MANAGEMENT INITIATIVES

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### EII PROCEDURES UPDATE

#### Purpose:

Disseminate the data and locational standards and guideline to the users in the field. Coordinate EII instructions and data collection to ensure EII's are reviewed and updated to incorporate data management changes, standards, and guidelines for managing information.

### DIGITAL GIS BASE MAP DATA COLLECTION

#### Purpose:

Provide the necessary base map information to carry out compliance and cleanup activities at the Hanford Site. This milestone will ensure TPA participants an accurate, dependable and controlled set of base map data.

### SITEWIDE ORTHOPHOTOGRAPHY PROGRAM

#### Purpose:

Establish a comprehensive, usable and long-term site-wide historical record of the Hanford Site. The orthophotography will provide the site with a single up-to-date source for all geographic baseline information from which to obtain automated spatial information.

### MONUMENT CONTROL NETWORK SYSTEM

#### Purpose:

With the transition from the Hanford Plant Coordinates from the WA State Plane Coordinate system, one, up-to-date official survey monument system needs to be adopted by all contractors and used in all engineering and GPS survey work conducted on site. This will enable a more uniform collection standard, and have assurance that all information collected meets that standard.

### ENGINEERING SURVEY DATA COLLECTION STANDARDS

#### Purpose:

Develop procedures and guidelines for engineering survey data collection, recording, and storage. At present, engineering surveys are conducted on site without regard to the importance or cost associated with the collection or generation of locational information.

## APPENDIX G - DATA MANAGEMENT INITIATIVES

### STANDARD WELL ID/NAMING AND LOCATION COORDINATES

#### Purpose:

Adopt a unique site-wide naming standard for well designations at the Hanford Site. These standards will be maintained and available in an on-line computer system. This system would also function as a cross reference table between existing standards and previous standards, and would also store the official X, Y, and Z coordinate location to be used by all other computer systems.

### HISTORIC DATA MANAGEMENT

#### Purpose:

Establish a Site historical data management system. As TPA activities develop, a system describing how the site looked, where buildings were located before D&D activities, and where historic waste sites existed will need to be developed.

At present, when buildings are removed from an area, the buildings are also removed from the engineering drawing without regard to its historical or environmental significance. In some cases these same buildings and their footprints are later classified as waste sites. Numerous types of historic information need to be saved, inventoried and tracked:

- Photography
- CAD Infrastructure Drawings
- Written Documents
- Borehole Logs

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**ATTACHMENT NUMBERS: 2, 3, 4, 5, 6, 7,  
9, 10, 12, 13, 14 and 15**

**ATTACHMENTS 2, 3, 4, 5, 6, 7, 9,  
10, 12, 13, 14 AND 15 TO THE  
DANGEROUS WASTE PORTION OF  
THE RESOURCE CONSERVATION  
AND RECOVERY ACT FOR THE  
TREATMENT, STORAGE AND  
DISPOSAL OF DANGEROUS WASTE**

**(SECOND DRAFT)**

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## ATTACHMENTS

The complete list of attachments to this Permit can be found on pages seven and eight of the Permit. These Attachments are included in the packet except for Attachments 1, 8, 11, 16, 17, and 18. These six attachments can be found at the four Public Repositories and in the Administrative Record for this Permit. They are as follows:

- Attachment 1 - Hanford Federal Facility Agreement and Consent Order, May 1989  
(As Amended)
- Attachment 8 - 616 Nonradioactive Dangerous Waste Storage Facility Permit  
Application (Parts A & B), Rev. 2, 9/91
- Attachment 11 - 183-H Solar Evaporation Basins and the 183-H Closure/Postclosure  
Plan, Rev. 3, 6/91
- Attachment 16 - 300 Area Solvent Evaporator Closure Plan, Rev. 3b, 9/92
- Attachment 17 - 2727-S Nonradioactive Dangerous Waste Storage Facility Closure  
Plan, Rev. 3, 1/92
- Attachment 18 - 305-B Storage Facility Permit Application (Parts A & B), Rev. 2,  
10/92

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